

Commentor No. 81: Mark M. Giese

From: Giese, Mark M _ RACIWI[SMTP:M.M.GIESE@MODINE.COM]
 Sent: Wednesday, August 23, 2000 1:20:00 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Cc: sra@snakeriveralliance.org%internet
 Subject: oppose restart of the FFTF in Washington
 Auto forwarded by a Rule

Mark M. Giese
 1520 Bryn Mawr Ave.
 Racine, WI 53403
 USA
 m.mk@juno.com

08/23/00

Dear Ms. Brown:

Please oppose restart of the FFTF in Washington.
 It is too hazardous.

Thank you.

Sincerely,
 Mark M Giese

81-1

Response to Commentor No. 81

81-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF. Included in the NI PEIS are the results of analyses that show the risks associated with operating the FFTF are very small.

Commentor No. 82: Pat Hamner

From: Pat Hamner[SMTP:PHAMNER@RICHLANDMED.COM]
Sent: Wednesday, August 23, 2000 6:35:40 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: FFTF
Auto forwarded by a Rule

Please restart the FFTF for medical isotopes.

Pat Hamner MD.

82-1

Response to Commentor No. 82

82-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 83: Eve Prior

From: Jim Prior[SMTP:JPRIOR@TELEPORT.COM]
 Sent: Thursday, August 24, 2000 3:27:20 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: Hanford Nuclear Reservation
 Auto forwarded by a Rule

Attention: Bill Richardson

Please shutdown the FFTF reactor and put that
 money into cleanup!

Sincerely,

Eve Prior
 112 NE 32nd Avenue
 Portland, OR 97232

|| 83-1
 || 83-2

Response to Commentor No. 83

-
- 83-1:** DOE notes the commentor's support for Alternative 5, Permanently Deactivate FFTF.
- 83-2:** The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected.

Commentor No. 84: R. Swain

From: RSwain203@aol.com%internet
[SMTP:RSWAIN203@AOL.COM]
Sent: Thursday, August 24, 2000 1:37:27 AM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: Please re_start FFTF for medical isotopes!
Auto forwarded by a Rule

Please re_start FFTF for medical isotopes!

Isotopes are an answer to cancer____over 1500 people die each day from cancer and the FFTF can supply a large quantity of high quality isotopes for treatment of cancer, heart disease and arthritis. It also will serve our nation's need for Pu_238 for space batteries, for "hardening" computer chips, and research for new non_proliferative fuels and transmuting our nation's plutonium wastes.

84-1

Response to Commentor No. 84

84-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 85: The Moses Family

From: Arati Moses[SMTP:ARATI7@YAHOO.COM]
 Sent: Thursday, August 24, 2000 1:20:10 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: Against Nuclear Power Production
 Auto forwarded by a Rule

To all Concerning:

To date there have been 347 nuclear accidents (recorded).
 WHAT MAKES PEOPLE BELIEVE THERE WILL NEVER
 BE POTENTIAL FOR ACCIDENTS FROM THIS DATE
 FOWARD?

The consequences of nuclear accidents are far too devastating
 to invest our country in. Our national health and committment
 to its citizens must direct our monies into safer forms of energy.

The Moses Family,
 Medical Doctors, Chemical Engineer, Bioligist,
 Environmental Engineer

85-1

Response to Commentor No. 85

85-1: A detailed discussion of accidents and the evaluation of accidents that could occur under implementation of the alternatives described in Section 2.5 is provided in Appendix I of Volume 2. As discussed in Chapter 4 of Volume 1, implementation of the alternatives would pose a small risk to persons residing within 80 kilometers (50 miles) of candidate facilities, and essentially zero risk outside of that area.

Although outside the scope of this PEIS, the commentor's interest in alternate energy sources is noted. The missions described in Section 1.2 of Volume 1 can only be accomplished with reactors and/or accelerators.

Commentor No. 86: Randy Brich

From: Quail[SMTP:MR.RB@WORLDNET.ATT.NET]
 Sent: Wednesday, August 23, 2000 1:30:27 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: FFTF EIS
 Auto forwarded by a Rule

Gentlemen:

I support the restart of FFTF at Hanford as a viable means to produce cancer_fighting isotopes and other missions. Failure to restart FFTF will indicate a lack of objectivity by the USDOE. The USDOE Low Dose Research Program <http://lowdose.org/index.html> is beginning to quantify the effects of chronic low doses on cancer incidence. Since the concern about low levels of ionizing radiation stems from applying the Linear no_threshold Theory (LNT) to extremely low doses, any information regarding the lack of validity of the LNT needs to be presented in the EIS.

Sincerely,

Randy Brich
 1469 Rimrock Ave
 Richland, WA 99352

86-1

86-2

Response to Commentor No. 86

86-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

86-2: Ongoing research into the health effects of low level doses of ionizing radiation has the potential to impact the way in which low dose health effects are modeled. As indicated in Appendix H, the linear no threshold model uses dose to cancer conversion factors that are derived from studies of individuals who received relatively large individual doses or were members of groups who received large population doses. One of the goals of current research is to improve health impacts models based upon health impacts to groups who have been exposed to lower level doses. However, this research is not yet conclusive with regard to thresholds for health impacts (if thresholds exist). The linear no threshold model is conservative and remains the currently accepted approach to modeling low level radiation health impacts.

Commentor No. 87: Dale Bartholomew

From: Dale Bartholomew[SMTP:DALEBARTHOLOMEW@WORLDNET.ATT.NET]
Sent: Wednesday, August 23, 2000 7:51:20 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: Radioactive Isotope Productio
Auto forwarded by a Rule

I was very fortunate to have I_125 radioactive seeds implanted into my prostate last year. This is one of the isotopes that is and will become in ever increasing short supply. To save the lives of future cancer patients, we need to re_start FFTF. On balance, saving lives takes priority over all objections to the restart.

Thank you for the opportunity to contribute my opinion.

Dale Bartholomew
1330 Broadview Drive
W. Richland, WA 99353

87-1**Response to Commentor No. 87**

87-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

**Commentor No. 88: James R. Beaver, Mayor,
City of Kennewick**



August 18, 2000

Colette E. Brown, Document Manager
Office of Space and Defense Power
Systems (NE-50)
Office of Nuclear Energy, Science and Technology
US Department of Energy
19901 Germantown Road
Germantown MD 20874

Attention: NI PEIS

Regarding: *Draft Programmatic Environmental Impact Statement for Accomplishing Expanded Civilian Nuclear Energy Research and Development and Isotope Production Missions in the United States, Including the Role of the Fast Flux Test Facility*

Dear Ms. Brown,

The City of Kennewick formally supports Alternative No. 1 in this document (restart FFTF). Please reference attached City of Kennewick Resolution No. 99-13.

The FFTF has a history of successfully testing nuclear fuels, materials, components, operating protocols, and reactor safety designs. It has a proven capability to function as a nuclear science and irradiation services user facility, and has successfully supported large and varied test programs for industry, nuclear energy, medical isotope applications and research, space nuclear power and fusion research programs.

A restart of the FFTF provides an economically viable method to use mixed oxide fuels supplies before using low enriched uranium. At the proposed operating power level of 100 megawatts, the reactor life would be extended and the generation of spent fuel would be reduced. Restart of the FFTF makes sense for the Tri-City Area, for the State of Washington, for the Department of Energy, and the United States.

Restart of the FFTF will provide the quickest method of assuring the availability of isotopes for medical, industrial and research applications while at the same time meeting the material needs of other federal agencies and undertaking research and development activities for the development of nuclear power for civilian use.

Once again the City of Kennewick fully supports Alternative No. 1 contained in the Draft Programmatic Environmental Impact Statement for Accomplishing Expanded Civilian Nuclear Energy Research and Development and Isotope Production Missions in the United States, Including the Role of the Fast Flux Test Facility (restart of the FFTF).

Sincerely,


James R. Beaver
Mayor

RDW:jw00-061FFTF

210 W. 6th Avenue • P.O. Box 6106 • Kennewick, WA 99336-0106
(509) 565-4200 • Fax (509) 565-4445

Response to Commentor No. 88

88-1

88-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

**Commentor No. 88: James R. Beaver, Mayor,
City of Kennewick (Cont'd)**

CITY OF KENNEWICK
RESOLUTION NO. 99 - 13

A RESOLUTION OF THE CITY OF KENNEWICK IN SUPPORT OF PREPARING AN
ENVIRONMENTAL IMPACT STATEMENT FOR RESTARTING THE FAST FLUX TEST
FACILITY AT HANFORD

WHEREAS, medical isotopes are increasingly being used in research and in providing new, cost-effective, cutting-edge technologies for the diagnosis and treatment of disease, including cancer, heart disease, and arthritis; and

WHEREAS, the United States is importing more than ninety percent of the reactor-produced medical isotopes currently used to save a significant number of the lives of our citizens; and

WHEREAS, market projections for utilization of medical isotopes for diagnosis and treatment show our country will need new production sources to assure a domestic supply to meet the increasing demand; and

WHEREAS, the Hanford Fast Flux Test Facility (FFTF) has unique capabilities for providing large quantities and a wide variety of high quality medical isotopes; and

WHEREAS, the FFTF was designed, constructed, and safely operated as a state of the art reactor with world class isotope production capabilities and is the newest, most sophisticated reactor in the U.S. Department of Energy complex and as such is an irreplaceable national asset; and

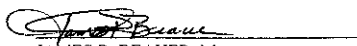
WHEREAS, the FFTF is presently being maintained in a stand-by mode; and

WHEREAS, the public deserves an opportunity to be involved in the decision making process to consider whether the FFTF should be restarted or permanently shut down; and

WHEREAS, preparing an Environmental Impact Statement (EIS) will formally involve the public in any decision about FFTF's future,

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Kennewick that it is in support of preparing an Environmental Impact Statement for restarting the Fast Flux Test Facility at Hanford and hereby encourages U.S. Department of Energy Secretary William Richardson to order an EIS for restarting the FFTF.

ADOPTED by the City Council of the City of Kennewick at its regular meeting on the 16th day of March, 1999.


JAMES R. BEAVER, Mayor

Attest:


VALERIE LÖFFLER, City Clerk

Commentor No. 89: Ana Sherwood

Draft PEIS Comment Form

We need FFTF, Please restart it.
The U.S. must start FFTF as it
is a facility we need. Please
have restart decision on technical
reasons/future needs. We must
make decisions that will position
us for the future. Short term drivers
are too often what drives political
decisions. Please, Please, restart
this worthy facility

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Ana Sherwood

Organization: none

Home/Organization Address (circle one): _____

City: Richland State: WA Zip Code: 99352

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

Response to Commentor No. 89

89-1

89-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 90: Dave Hess

Response to Commentor No. 90

Draft PEIS Comment Form

Our Nuclear Infrastructure has gone downhill since the election of President Carter. If the US desires to regain some of the forgotten nuclear technologies that it started but never used or developed, the keeping the FFTE on line for ^{reconstruction} medical isotope production is a place to start.

Otherwise, rename the Dept. of Energy to what it really is: The Dept. of Anti Energy and eliminate it.

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- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Dave Hess

Organization: _____

Home/Organization Address (circle one): _____

1324 Davison

City: Richland State: WA Zip Code: 99352

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

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U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

90-1

90-1: DOE notes the commentor's support for Alternative 1, Restart FFTE.

Commentor No. 91: Joy Fiore

Draft PEIS Comment Form

Isotopes that can be provided by the FFTF are needed today more than ever. Let's protect our investment in the FFTF and reopen it so we reduce dependence on foreign countries for isotopes that advance medical and scientific research for America.

91-1

91-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

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- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): Joy Fiore

Organization: _____

Home/Organization Address (circle one): HC 31 Box 709City: SANDY VALLEY State: NV Zip Code: 89019Telephone (optional): 702-723-1054E-mail (optional): alljoy@sandyvalley.net

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-SO
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

Commentor No. 92: Fred K. Mangan

Response to Commentor No. 92

Draft PEIS Comment Form

We need to continue funding on the Fast Flux Test Facility (FFTF). This is a research treasure that will allow the United States to be independent of foreign countries for various isotopes that are useful in the medical community.

Let's keep our ability to continue with the nuclear research that can be provided by FFTF.

92-1

92-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

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- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Fred K. Mangan

Organization: _____

Home/Organization Address (circle one): 135 Orchard WayCity: Richland State: WA Zip Code: 99352

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-SG
U.S. Department of Energy • 1901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Commentor No. 93: K. M. Probasco

Draft PEIS Comment Form

We need FFTF, please restart it.
Use it for deep space probes instead
of purchasing isotopes from Russia.

Do not throw away a valuable resource
that can be used to make medical
isotopes.

Do not be penny-wise AND pound
foolish on this issue.

SAVE FFTF!

93-1

93-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): K. M. PROBASCO

Organization: _____

Home/Organization Address (circle one): 4711 MOSAIC DRIVE

City: PASCO State: WA Zip Code: 99301

Telephone (optional): _____

E-mail (optional): KM.PROBASCO@PNL.GOV

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Collette E. Brown, NE-50
U.S. Department of Energy • 1901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

Response to Commentor No. 93

Commentor No. 94: Anonymous

Response to Commentor No. 94

Draft PEIS Comment Form

*We need FFTF, please
restart it.*

94-1

94-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

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- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): _____

Organization: _____

Home/Organization Address (circle one): _____

City: _____ State: _____ Zip Code: _____

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

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U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Commentor No. 95: T. C. Probasco

Draft PEIS Comment Form

We need FFTF, please restart it

95-1

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): T.C. Probasco

Organization: _____

Home/Organization Address (circle one): _____

1315 Marshall AveCity: Richland State: WA Zip Code: 99352-3235

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

Response to Commentor No. 95

95-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 96: Marsha Bell

Response to Commentor No. 96

Draft PEIS Comment Form

FFTF should be operating to
produce medical isotopes and
power!

Why destroy or lose a national resource?
We need FFTF to operate so not
be dependent on other countries!
Start plans to restart FFTF now

96-1

96-1: DOE notes the commentor's support for Alternative 1, Restart FFTF. It should be noted that power production is not one of the missions for which FFTF would be restarted.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

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- calling toll-free and leaving your comments: 1-877-562-4592
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): MARSHA A. BELL

Organization: _____

Home/Organization Address (circle one): 1532 Elliot Bay Dr.

City: Sage State: FD Zip Code: 83860

Telephone (optional): 208-265-8953

E-mail (optional): MBATLAK@TELVAR.COM

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-60
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free telephone: 1-877-562-4593 • Toll-free fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Commentor No. 97: Patrick B. O'Callaghan

Draft PEIS Comment Form

WE NEED BASIC SCIENTIFIC RESEARCH
THAT CAN BE PROVIDED BY THE FFTF.
IN ADDITION THE FFTF CAN HELP SAVE
LIVES BY PRODUCING RARE ISOTOPES.
FINALLY THE LIFE SAVING WORK THE
FFTF CAN PERFORM CAN HELP DEFRAY
OPERATIONAL COSTS.
IT IS A WIN WIN SITUATION.

THANKS

Patrick B. O'Callaghan

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

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- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): PATRICK B. O'CALLAGHAN

Organization: _____

Home/Organization Address (circle one): 15611 SW PERIDOT WAY

City: BEAVERTON State: OR Zip Code: 97007

Telephone (optional): 503 579-8476

E-mail (optional): PB.COC@AOL.COM

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

Response to Commentor No. 97

97-1

97-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 99: Bryan Coles

From: Bryan D Coles[SMTP:COLESBD@BOSSIG.COM]
 Sent: Friday, August 25, 2000 4:47:00 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: Comments on Draft PEIS
 Auto forwarded by a Rule

Dear Collette E. Brown,

I am writing to provide my opinion on the draft PEIS for Expanded Nuclear Energy Research and Development and Isotope Production. It is quite obvious from the information provided that the restart of the FFTF is the best option for meeting all of the goals laid out in the statement.

Clearly, the most important reason for this is that the FFTF is already built, would not require a large investment in time and resources to restart and has a proven track record in meeting the mission objectives the Department of Energy is trying to accomplish. It is designed to meet NRC requirements and has been operated with excellence since being started up.

Other options such as an accelerator would not meet all of the mission objectives and would require a lengthy startup process and large budget expenditures. It would also require large amounts of power at a time when the electrical production in this country is becoming less able to meet current demands on a daily basis.

The PEIS speaks to the building of a new reactor as an option. I do not believe that all of the issues were addressed adequately in the PEIS. Scaling up a current design such as a TRIGA without an extensive re_licensing process would not be possible. Public reaction to a new reactor would most likely be as adverse as restarting FFTF. The cost for a new reactor would most likely be far in excess of the cost to restart FFTF. The Department of Energy would most likely suffer cost overruns and delays if this option were chosen.

99-1

99-2

99-3

Response to Commentor No. 99

99-1: DOE notes the commentor's support for Alternative 1, Restart FFTF, and opposition to Alternative 3, Construct New Accelerator(s), Alternative 4, Construct New Research Reactor, and the No Action Alternative.

99-2: See response to comment 99-1.

99-3: See response to comment 99-1.

Commentor No. 99: Bryan Coles (Cont'd)

The option for maintaining the status quo is also untenable. It makes no sense to maintain the FFTF in standby for an indefinite time as this drains valuable resources from the Federal budget for no gain. If it is not restarted now, the odds of restart any time in the future will become even more improbable.

On a final note, the Department of Energy should look at the publicity that is being generated during this debate. It should be obvious there is an intensive propaganda campaign being conducted by anti_nuclear special interest groups with the full support of the media, to create hysteria and fear over risks that negligible. The Department should mount a rebuttal to these efforts to make sure that the truth is made available to the public so they may make an informed decision.

Thank you for the opportunity to comment on this important decision.

Bryan Coles
1970 S. 38th Ave.
West Richland WA 99353

99-4

99-5

Response to Commentor No. 99

99-4: See response to comment 99-1.

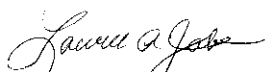
99-5: DOE notes the commentor's views including the need to keep the public accurately informed. In doing so, DOE has established reading rooms near DOE sites to provide easy access to information about DOE programs and encourages the use of this source of information. Further, DOE has numerous web sites, including one for NE (<http://www.nuclear.gov>), that provide up-to-date-information complete with fact sheets, news releases, and other materials. It is also DOE policy to encourage public input on matters of regional, national and international importance. In compliance with NEPA and CEQ regulations, DOE provided opportunity to the public to comment on the scope of the NI PEIS and the environmental impact analysis of DOE's proposed alternatives. DOE gave equal consideration to all comments. In preparing the Final NI PEIS DOE carefully considered comments received from the public.

Commentor No. 100: Lowell A. Jobe Coalition-21

Comments on DOE NI-PEIS-0310D by Lowell A. Jobe, member Coalition-21, a volunteer organization of 80 people throughout Idaho, headquartered in Idaho Falls, dedicated to Supporting Tomorrow's Technologies with Facts, not Fears, focussing particularly on nuclear issues.

Although any EIS does not require a comparative cost evaluation of the alternatives, a complete systems analysis requires that this information is one of the key factors that needs to be used by DOE in their decision making to assure maximum cost effectiveness. The public also needs to have this information in order to make common sense decisions and comments on such documents. DOE should always strive to make this information publically available at the time the EIS is made available and before public hearings are held. Since this information is not currently available to us, our final comments will await its availability.

At this time we wish to express our support for the projects and our backing for the short term implementation of the ATR and FDPF/ CPP651 facilities as part of INEEL's designation as the DOE Lead Laboratory for Nuclear Energy Research & Development mission.



Lowell A. Jobe
14469 N. 55th E.
Idaho Falls, ID 83401

100-1

100-2

Response to Commentor No. 100

100-1: Pursuant to CEQ regulations (40 CFR 1505.1(e)), agencies are encouraged to make decision documents such as the cost report available to the public before a decision is made. The cost report was made available to the public on August 24, 2000. The Record of Decision concerning enhancement of DOE's nuclear infrastructure is scheduled for January 2001. Comments from Coalition 21 and DOE's responses to those comments are given in comment number 1655 below.

100-2: DOE notes the commentor's support for Alternative 2, Use Only Existing Operational Facilities, Option 2, Irradiate at ATR and Process/Store at FDPF/ CPP651.

Commentor No. 101: Carolyn Gardner

Response to Commentor No. 101

Draft PEIS Comment Form

My thought is that we have this in Idaho and close to us we will be in a better position to have a space port here. I have an MPEI even so often and am interested in the processing of the MPEI and its progression. Also, I am a part of the Meater Luckner program and my interests there are in the employment aspects of preparing or receiving prep for space flight of products going into space. As an interest note, I wonder who helps get the astronauts ready for launch in their suits. I also am ID3 and the satellite working are of interest.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): Carolyn Gardner

Organization:

Home/Organization Address (circle one): 940 Jefferson Avenue

City: Idaho Falls State: ID Zip Code: 83402

Telephone (optional): 208-523-3472

E-mail (optional): rgardner@usurf.net
cpgardner@highway.net

COMMENTS MUST BE POSTMARKED BY September 18, 2000

For more information contact: Collette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

101-1

101-1: DOE notes the commentor's interest in opportunities related to space missions.

Commentor No. 102: Ken and Nancy VanDyken

From: Ken (038) Nancy VanDyken
[SMTP:NVANDYKEN@PRODIGY.NET]
Sent: Friday, August 25, 2000 5:48:23 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: FFTF
Auto forwarded by a Rule

Please re_start FFTF for the production of medical isotopes. We should not lose this facility _it's a national treasure! Thank you!

_Ken & Nancy VanDyken

102-1***Response to Commentor No. 102***

102-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 103: Gay Arpan

From: Karen Gay Arpan[SMTP:KGARPAN@MCN.NET]
Sent: Friday, August 25, 2000 8:17:47 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: FFTF
Auto forwarded by a Rule

I am sending this email to ask you to restart the Fast Flux Test Facility. I think it is a shame you have this facility closed when it is in good shape and will be for years to come. Why are we importing isotopes when they could be made right here and better than anything we could import from Russia.

I think we should use all of the resources we have at home instead of depending on importing everything all of time.

Sincerely yours,
Gay Arpan
P.O. Box 38
Alzada, Montana 59311

103-1

Response to Commentor No. 103

103-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 104: Barbara J. French

From: Barbara J. French[SMTP:NTR@OWT.COM]
Sent: Friday, August 25, 2000 8:34:17 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: FFTF SUPPORT
Auto forwarded by a Rule

I support keeping the FFTF for Medical Isotope production.

104-1***Response to Commentor No. 104***

104-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 105: Suzanne Zehms Heaston

From: suzanne[SMTP:SHEASTON@OWT.COM]
 Sent: Saturday, August 26, 2000 8:13:47 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: Restart FFTF!!
 Auto forwarded by a Rule

Dear Secretary Richardson:

Over 1500 people die of cancer each day. The Fast Flux Test Facility is our nation's newest, most versatile reactor capable of producing large quantities of high quality medical isotopes for treating cancer, arthritis and other diseases.

We already face isotope shortages for research and treatment. Human clinical trials for breast cancer were cancelled due to a unavailability of Cu_67. Last year, the Seattle area faced shortages for the isotope "seed" treatment for prostate cancer.

The FFTF is desperately needed to produce isotopes for the treatment of bone pain associated with cancer. If you have ever witnessed a family member or a friend with terminal cancer with excruciating bone pain, you know what a God_send pain relief from medical isotopes are. This type of isotope cannot be produced in an accelerator__it must be produced in a reactor.

Restarting the FFTF will save lives and enable us to utilize cutting_edge technologies for the 21st century.

I implore you to make the right decision for the citizens of our nation. RESTART the FFTF!!! The life you save may be that of a family member, a friend, or your own.

Suzanne Zehms Heaston
 8983 Underwood Lane
 Maple Grove, Minnesota 55369

105-1

Response to Commentor No. 105

105-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 106: Neil Taylor

From: Neil Taylor[SMTP:NAT@3_CITIES.COM]
Sent: Sunday, August 27, 2000 12:31:00 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: Restart FFTF
Auto forwarded by a Rule

Please re_start FFTF for the production of medical isotopes.

106-1***Response to Commentor No. 106***

106-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 107: M. S. Bergez

From: MSBergez[SMTP:MSBERGEZ@MCIWORLD.COM]
Sent: Sunday, August 27, 2000 5:23:54 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: "Please re_start FFTF for the
Auto forwarded by a Rule

"Please re_start FFTF for the production of medical
isotopes."

107-1

Response to Commentor No. 107

107-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 108: Judith A. Freeman

From: NPcaboose@aol.com%internet
[SMTP:NPCABOOSE@AOL.COM]
Sent: Sunday, August 27, 2000 5:28:33 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: I need medical isotopes. Please help!
Auto forwarded by a Rule

To Whom This May Concern:

I am a two year survivor of ovarian cancer with powerful odds against me for living beyond five years. The five year survival rate for ovarian cancer in this country is 14%, but the six year mortality rate in a study in England was only 10% with the use of "smart bullets" (medical isotopes), and this country needs our reactors and nuclear stockpiles to treat cancer patients.

I cannot urge you enough to please make the right decision. I need medical isotopes as do so many millions of other cancer patients. Some would call this is the "American Holocaust" with the death of so many from cancer who could have been treated with "smart bullets" but were not. It is a most frustrating situation.

Thank you for your help.

Sincerely,
Judith A. Freeman
4411 N. 37th Street
Tacoma, WA 98407_5615
NPcaboose@aol.com
(253) 752_3724

108-1

Response to Commentor No. 108

108-1: DOE notes the commentor's support for greater availability of medical isotopes. For nearly 50 years, DOE's use of its unique technologies and capabilities to develop isotopes for civilian purposes has enabled the widespread application of medical isotopes seen today. Under the proposed action, DOE would enhance its existing nuclear facility infrastructure to more effectively support production of radioisotopes for medical applications and research.

Commentor No. 109: D. F. Spellman

From: handle@owt.com%internet
[SMTP:HANDLE@OWT.COM]
Sent: Sunday, August 27, 2000 5:49:36 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: FFTF Restart
Auto forwarded by a Rule

Please ensure the re_start of the Fast Flux Test Facility (FFTF) for the domestic production of medical isotopes. It would be a tragedy if ignorance and irrational fear were allowed to triumph over a unique, safe, and proven scientific/technical facility that offers hope for successful diagnosis and treatment of countless cancer patients in the United States and abroad.

D. F. Spellman
1116 S. Highland Place
Kennewick, WA 99337

109-1

Response to Commentor No. 109

109-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 110: Misty Esparza

From: Misty M. Esparza[SMTP:PLAYMISTY4ME@EARTHLINK.NET]

Sent: Monday, August 28, 2000 9:28:15 AM

To: INFRASTRUCTURE_PEIS, NUCLEAR

Subject: FFTF

Auto forwarded by a Rule

Please support the re_starting of FFTF. I feel it is very important in many areas, but especially in the field of medicine.

Thank You,
Misty Esparza

110-1***Response to Commentor No. 110***

110-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 111: Floyd Ivy

NI PEIS Toll_Free Telephone

8/26/00

Floyd Ivy
Attorney in Kennewick, WA

I favor restarting FFTF for all the proposed applications including isotopes and Pu_238. Please restart FFTF. Thank you.

111-1

Response to Commentor No. 111

111-1: DOE notes the commentor’s support for Alternative 1, Restart FFTF.

Commentor No. 112: Elizabeth Roberts

NI PEIS Toll_Free Telephone

8/26/00

Elizabeth Roberts
360_479_6399

You need to stop holding public meetings and you need to follow what you need to do. You need to close down FFTF forever. It is horribly contaminated. We do not need it for medical isotopes; that is a diversion. The Department of Energy and the government wants it to produce tritium, and the only reason for that is for nuclear weapons which are illegal according to international law.

You need to stop wasting the taxpayers money and you need to use all the money you have right now for cleanup. I have been to at least three of these hearings in Seattle, and each time I have stated that you need to close it down. You need to start following the law and you need to do it now. Thank you.

112-1

112-2

112-3

112-4

Response to Commentor No. 112

112-1: Comment noted. DOE is committed to providing the public with comprehensive environmental reviews of its proposed actions in accordance with NEPA, and holding public hearings is an essential and required part of the NEPA process.

112-2: DOE notes the commentor's support for Alternative 5, Permanently Deactivate FFTF. DOE also notes the commentor's concerns regarding the existing contamination at Hanford and the cleanup mission. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

112-3: DOE notes the commentor's views. However, the purpose of the NI PEIS is to evaluate the environmental impacts of reasonable alternatives to fulfill the requirements of the proposed actions, which include the production of medical and industrial radioisotopes, the production of plutonium-238 for future NASA space exploration missions, and civilian nuclear research and development. No component of the proposed action is for the purpose of producing tritium, nor is it for the purpose of supporting any other defense or weapons-related mission.

DOE has sought independent analysis of trends in the use of medical isotopes, and of its continuing role in this sector, consistent with its mandates under the Atomic Energy Act. In doing so, it established two expert bodies, the Expert Panel and the NERAC. In 1998, the Expert Panel, which convened to forecast future demand for medical isotopes, estimated that the expected growth rate of medical isotope use during the next 20 years would range from 7 to 14 percent per year for therapeutic applications, and 7 to 16 percent per year for diagnostic applications. These findings were later reviewed and endorsed by NERAC, established in 1999 to provide DOE with expert, objective advice regarding the future form of its isotope research and production activities. DOE has adopted these growth projections as a planning tool for evaluating the potential capability of the existing nuclear facility infrastructure to meet programmatic requirements. In the period since the initial estimates were made, the actual growth of medical isotope use has

Commentor No. 112: Elizabeth Roberts (Cont'd)

Response to Commentor No. 112

tracked at levels consistent with the Expert Panel findings. Section 1.2.1 of Volume 1 was revised to incorporate this information and to clarify DOE's role in fulfilling the U.S. research and commercial isotope production needs.

- 112-4:** See response to comment 112-2. Additionally, Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy agreed to a change in the Tri-Party Agreement to place the milestones for FFTF's permanent deactivation in abeyance until the DOE reaches a decision on FFTF's future. Public meetings were held on this formal milestone change.

The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected. Therefore, the NI PEIS missions would not have an impact on Hanford cleanup activities.

Commentor No. 113: Brian Watson

NI PEIS Toll_Free Telephone

8/26/00

Brian Watson
360_479_6399
Bremerton, WA

I would like to offer a comment as to the plans to produce plutonium and radioactive isotopes at FFTF at Hanford. Why do I have to keep calling back, this is ridiculous. You all know that there are so many problems with radioactive and other toxic wastes at Hanford already that can't really be dealt with. To even be considering additional production of radioactive materials and toxic materials at Hanford is unconscionable. DOE, you guys really need to look at _ look at yourself, how can you sleep at night. Really ridiculous. As you can guess, I really strongly feel that this additional production of Pu_238 is not only dangerous and it is unnecessary, and I'd ask you to consider the relative merits of putting more spacecrafts up into the air up in space versus the health and safety of our family and children. Frankly, I would rather have health and safety of our children then another satellite. So please don't start FFTF, and focus all of the energy and resources at Hanford on mitigation, remediation, and cleanup efforts. That's where our responsibility lie. You guys made a big mess and your job is to clean up and it will be the children's job to clean it up. Quite a gift. The least we can do is not make the gift any worse then it already is for our descendants. Please do what you outta do. Thank you.

113-1

113-2

113-3

113-1

Response to Commentor No. 113

113-1: DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

Steady and consistent progress in restoring the Hanford Site is documented in annual reports, available to the public at www.hanford.gov. The Hanford Site has a comprehensive waste minimization and pollution prevention program in place as summarized in Volume 1, Section 3.4.11.8 that would govern any proposed site activities.

113-2: DOE notes the commentor's opposition to enhancing its existing nuclear facility infrastructure to support production of plutonium-238 for use in future NASA space exploration missions. Section 1.2.2 of Volume 1 was revised to clarify the purpose and need for reestablishing a domestic plutonium-238 production capability to support NASA space exploration missions.

Potential health and safety impacts associated with normal operations, facility accidents, and transportation as a result of the proposed production of plutonium-238 are low and are discussed in detail in Chapter 4 of Volume 1 and appendixes H, I, and J of Volume 2 in the Final NI PEIS. Potential health and safety impacts associated with future launches of spacecraft are not within the scope of the NI PEIS analysis, but would be addressed in the specific NEPA documentation prepared by NASA in support of such missions.

113-3: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

Commentor No. 114: Valerie Nichols

NI PEIS Toll_Free Telephone

8/27/00

Valerie Nichols
206_417_5082

I am calling to comment on the proposed reopening of the Hanford site and also the proposed use of that site as a low_level waste facility. I am appalled that you people are considering reopening Hanford and using it as a waste dump. I thought this black hole had been plugged for good but apparently not. So I am planning to do everything I can to counter this action, and I plan to tell everyone I know that I am a US citizen that is voting. I am a US citizen and I definitely plan to get the word out. So please, as far as I am concerned don't No, No, No reopen the Hanford site and use it as a waste disposal site as well. Thank you.

114-1

Response to Commentor No. 114

114-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF. DOE was tasked by Congress in the Atomic Energy Act of 1954, as amended, to "ensure the availability of isotopes for medical, industrial, and research applications, meeting the nuclear material needs of other federal agencies, and undertaking research and development of activities related to development of nuclear power for civilian use." The purpose of this PEIS is to determine the environmental and other impacts to accomplishing this mission from all reasonable existing and new DOE resources. The FFTF at the Hanford Site was one of several existing DOE resources that was assessed for this mission.

Section 1.2 of the NI PEIS provides information on the purpose and need for DOE's proposed expansion of the nuclear infrastructure to ensure the availability of isotopes for medical, industrial, and research applications; providing plutonium-238 for NASA, and undertaking research and development activities related to development of nuclear power for civilian use. Although one irradiation facility and several support facilities on the Hanford Site (i.e., Alternative 1, Restart FFTF) were evaluated for mission effectiveness, the scope of this PEIS does not include using the Hanford Site as a "waste dump."

Currently, both government and commercial waste disposal sites operate within the boundaries of the Hanford Site. These are permitted by Washington State.

Commentor No. 115: Donna Olsen

NI PEIS Toll_Free Telephone

8/27/00

Donna Olsen
503_222_2256

Simple statements Restart FFTF for medical isotopes, that is via someone who has educated me on the whole system. That is my simple statement restart FFTF.

115-1

Response to Commentor No. 115

115-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 116: Kathy Jex

From: Jex, Kathy[SMTP:KJEX@USWEST.COM]
Sent: Monday, August 28, 2000 10:35:42 AM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: PLEASE RESTART THE FFTF
Auto forwarded by a Rule

116-1***Response to Commentor No. 116***

116-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 117: Hanford Observer

From: Hanford Observer[SMTP:HANFORD_OBSERVER@HOTMAIL.COM]
 Sent: Monday, August 28, 2000 3:47:14 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Cc: hanfordwatch@telelists.com%internet
 Subject: My Comments on the Nuclear Infrastructure PEIS
 Auto forwarded by a Rule

To: Nuclear.Infrastructure_PEIS@hq.doe.gov
 CC: hanfordwatch@telelists.com
 From: Hanford_Observer
 Subject: Comments on the Nuclear Infrastructure PEIS.

Please excuse this form of providing comments on the Nuclear Infrastructure PEIS _ I dont wish to give my name and address, since I fear retaliation by the Dept. of Energy (otherwise called DoH! in the rest of this document). While DoH! talks a lot about a zero_tolerance policy for reprisals against whistleblowers, their actions show that in actuality, they have a zero_tolerance against whistleblowers themselves.

My comments are all general in nature and are as follows:

- 1) The environmental consequences of accidents are probably based on out_of_date accident analyses. Since the facility was last licensed to operate, DoH! has increased the safety requirements.
- 2) Because of 1) above, the conclusions based on this out_of_date analyses are suspect.
- 3) Because of the need to revisit the safety analysis, and modify the FFTF facility to meet the new tougher requirements, the costs and schedule for the FFTF restart are probably significantly underestimated.

117-1

117-2

Response to Commentor No. 117

- 117-1:** FFTF can be safely operated to support the nuclear infrastructure missions described in Section 1.2 of Volume 1. Section 4.3 of Volume 1 provides the results of the evaluation of potential health impacts that would be expected from implementation of Alternative 1, including normal operations and a spectrum of accidents that included severe accidents. The accidents evaluated in the NI PEIS were based upon the latest facility safety analysis reports, recent analyses performed specifically in support of the NI PEIS and other pertinent information. The FFTF currently meets all safety and environmental requirements established by DOE. These DOE requirements are consistent with those established by regulatory agencies such as the Nuclear Regulatory Commission and the Environmental Protection Agency. The environmental analysis showed that radiological and nonradiological risks associated with restarting FFTF would be small.
- 117-2:** DOE notes the commentor's opinion. DOE has confidence in the cost and schedule estimate for FFTF restart.
- 117-3:** The NI PEIS presents the incremental risk associated with each of the alternatives. Sections 4.2-4.6 of Volume 1 provide the results of the evaluation of potential health impacts that would be expected from implementation of the alternatives, including normal operations and a spectrum of accidents that included severe accidents. The accident review included internal events, external events, natural phenomena, common-cause events, and sabotage and terrorist activities. In the event of an earthquake, the FFTF could be safely shutdown, and nonessential personnel evacuated. The environmental analysis showed that radiological and nonradiological risks associated with an earthquake would be small.
- 117-4:** DOE notes the commentor's concerns. This NI PEIS has been prepared in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and the related CEQ and DOE implementation regulations (40 CFR Parts 1500 through 1508 and 10 CFR Part 1021), respectively. The environmental impacts of reasonable alternatives to fulfill the requirements of the missions were disclosed and evaluated in the NI PEIS. DOE made every effort to obtain, analyze, and disclose all required information to make a decision on expanding nuclear infrastructure. Further, DOE evaluated each environmental resource area in a consistent manner across all the alternatives to allow a fair comparison among the various alternatives. The costs of proposed

Commentor No. 117: Hanford Observer (Cont'd)

4) The FFTF facility sits on the Hanford site. There are several facilities that exist at the Hanford site that do not meet the increased safety requirements. In fact, these facilities provide an unacceptable risk from such common_cause accidents as seismic events, however these risks will not be reduced to acceptable level for years to come. If there were a seismic event and FFTF were operating, the consequences would be increased further, since a seismic event could reasonably be expected to affect not only FFTF, but other facilities such as the waste tanks, PFP, K_basins, and other facilities. How can you justify increasing environmental consequences of accidents further, when already they dont meet the current DoH! requirements?

117-3

5) DoH! always underestimates the costs and always underestimates the environmental consequences of their actions. Why should this PEIS be any different? The PEIS should be done by an independent organization, such as the EPA, or by the State of Washington, as it lacks credibility.

117-4

6) Restarting FFTF will increase the costs and scope for the Hanford cleanup mission. As a result funds will have to be used which could have been used to improve the environment and the cleanup schedule will probably have to be stretched out. How can we justify making a site that is already dirty even dirtier? You cant have it both ways _ either the site needs to be cleaned up or it doesnt. If it needs to be cleaned up, the first step needs to be stop activities which makes it dirtier.

117-5

7) In my view, there is no need to restart FFTF. There are cheaper ways to accomplish the proposed mission. This is simply a political payoff by the Klinton_Bore administration for the politically loyal _ it is a very expensive jobs program for the Tri_Cities area. Why not just pay everybody in the area a small sum of money a year and forget about restarting this dinosaur?

117-6

117-7

Response to Commentor No. 117

actions are not required by NEPA and CEQ regulations to be included in a PEIS. DOE prepared a separate Cost Report and Nuclear Infrastructure Nonproliferation Impact Assessment to provide additional pertinent information to the Secretary of Energy so that he may make an informed decision with respect to the alternatives presented in the NI PEIS.

117-5: The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected. Therefore, the missions delineated in the NI PEIS would not have an impact on Hanford cleanup activities.

FFTF and the proposed support facilities at Hanford currently exist and will eventually be deactivated. The use of these facilities for this mission will not expand the scope of the Hanford cleanup. An increase in restoration costs should only result from postponing FFTF deactivation until after the Facility's contribution to the NI PEIS mission is completed.

117-6: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

117-7: DOE notes the commentor's concern. The purpose of the proposed action in the PEIS is not jobs, but to help meet the Nation's needs in isotope production and nuclear research.

Commentor No. 118: Thomas Schaffer
Hanford Atomic Metal Trades Council



August 23, 2000

Colette E. Brown, NE-50
 U.S. Department of Energy
 19901 Germantown Road
 Germantown, MD 20874

Dear Ms. Brown:

FFTF already has a proven track record for safe and environmentally friendly operation, but the true benefits of this facility are yet to be realized. If you support restarting this reactor, it can produce high quality medical isotopes to treat numerous cancer patients, including some of our members, and possible other patients with other diseases. American production of isotopes will allow continued advancements in medical research, and provide jobs for American labor. This would keep American dollars in America, improving our economic as well as the well being of American families. As the new millennium progresses, alternatives to the use of petroleum fuels must also be identified. The research performed at the FFTF reactor will help scientists and engineers develop safe and economical sources of energy.

Therefore, on the behalf of the Hanford Atomic Metal Trades Council, we would like to express our support on the draft PEIS. We agree there is a need and that the Department of Energy should take immediate action in this area. It is also our opinion, that FFTF is a unique resource to implement a new path forward. This path forward would allow this country to advance technologically, medically, and economically in a totally safe manner.

118-1

Response to Commentor No. 118

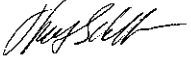
118-1: DOE notes the Council's support for Alternative 1, Restart FFTF.

Commentor No. 118: Thomas Schaffer (Cont'd)
Hanford Atomic Metal Trades Council

The PEIS identified a number of alternatives to supply needed isotopes, and research opportunities that the Department of Energy is responsible for providing. We commend conducting an environmental review. We believe you will find FFTF is uniquely situated to address these needs and be cost effective. Our future is in our children, and we must leave them a legacy of sustainable health and sustainable energy. We have already built an outstanding facility capable of meeting these needs, and now it is time to recoup our investment by starting and operating this reactor. We must move forward. We look forward to your decision to restart FFTF.

Sincerely,

HANFORD ATOMIC METAL TRADES COUNCIL



Thomas Schaffer
President
H.A.M.T.C.

118-1
(Cont'd)

Response to Commentor No. 118

Commentor No. 119: Clarence A. Strand

File: ftfefs01

262 Ada St.
Richland, WA 99352-3916
August 21, 2000

Ms. Colette Brown
DOE Office of Space & Defense Power Systems, NE-50
19901 Germantown Road
Germantown, MD 20874-1290

FFTF EIS Hearing on Isotopic Production

I attended the last information meeting on the subject here in Richland, but will be out of town and unable to attend the August 29 meeting. I recommend that the start up of the FFTF be expedited for the research and development of isotopes needed for medical, heat source and industrial purposes. Several isotopes needed are in short supply. Often we depend upon foreign and sometimes unreliable sources. The availability and quality of medical isotopes from foreign sources can be affected by the political climate in the supplying country and can cause delays in procurement of the needed materials.

Isotope production is admittedly expensive, but the use of medical isotopes would be beneficial to mankind. Isotopes have been used for the diagnosis, treatment, and extending life of patients with cancer and heart diseases well as other diseases. The FFTF could be a valuable research tool for breakthroughs in cancer treatment. This facility already exists and it would be a crime not to utilize it, especially for research, development and production of medical isotopes.

I recommend that the FFTF be made ready for research and the production of medical isotopes as soon as possible

Sincerely


Clarence A. Strand

Response to Commentor No. 119

119-1

119-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 120: Marcus Beck and Family

Draft PEIS Comment Form

We need FFTF - please Restart it.
It is unbelievable to us that this
is even a point of contention. We will
vote our conscience if this issue is not
resolved soon and in a definite manner.

120-1

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Marcus Beck & Family
 Organization: Corvallis Educational Service District
 (Home/Organization Address (circle one)): 340 NW 21st

City: Corvallis State: Ore Zip Code: 97330

Telephone (optional):
 E-mail (optional): beck.m@cesd.orst.edu

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-50
 U.S. Department of Energy • 19801 Germantown Road • Germantown, MD 20874
 Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
 E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

7/12/00



Response to Commentor No. 120

120-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 121: Milton H. Campbell

Response to Commentor No. 121

Draft PEIS Comment Form

See attached comments

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- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): *Milton H. Campbell*

Organization: *refused*

Home/Organization Address (circle one): *2119 Beech Ave*

City: *Richland* State: *WA* Zip Code: *99352*

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

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U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20824
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

Commentor No. 121: Milton H. Campbell (Cont'd)

Comments on the Draft PEIS on Isotope Production Missions DOE/EIS-0310D

Thank you for sending me the full text of the PEIS so that I could review it before making comment. I will avoid the public comment meetings for they are dominated by activists who care little for my supportive opinion and make it very uncomfortable for conscientious people to express themselves.

I was most dismayed the day after I received the full PEIS to read in the paper that Heart of America spokesman felt that cost-wise the accelerator option was less costly than operating FFTF. I read the report carefully and found no cost comparison charts on which to base such an opinion. The PEIS by definition does not make such comparisons and such comments should be ignored. An additional comment that the PEIS authors were biased toward the FFTF should also be ignored. After all when you want a brain surgeon, you don't go to the garbage collector for an opinion!

On the whole, I found that the treatment of the alternatives was acceptable. I feel that the FFTF provides the most immediate and viable avenue to producing medical isotopes and ²³⁸Plutonium. The target prep and target processing operation is common to all alternatives presents a common waste source and risk potential to the public and to the workers.

Negative comments on waste production should be anticipated. That every activity has a waste release cannot be denied, even in our breathing we exhale carbon dioxide. Recognition of the waste stream, and good engineering practices to minimize and contain it are the solution, not where it will be treated or ultimately go.

As far as the PEIS goes, I am concerned with one major omission. The accelerators would require a major power source, but I do not find an impact assessment for this requirement. Considering the limited state of our electrical generation industry throughout the nation, I believe that this requirement should be included in the constraints for this option.

In summary, I believe the FFTF should be selected to fulfill the needs cited in this PEIS.

Milton H. Campbell
Richland, WA 99352

Milton H. Campbell
2119 Beech Ave
Richland, WA 99352

121-1

121-2

121-3

121-4

121-5

121-3

Response to Commentor No. 121

121-1: DOE notes the commentor's views. DOE is committed to providing the public with comprehensive environmental reviews of its proposed actions in accordance with NEPA, and to providing ample opportunity for public comment on those actions. The costs of proposed actions are not required by NEPA and CEQ regulations to be included in a PEIS. DOE prepared a separate Cost Report to provide additional pertinent information to the Secretary of Energy so that he may make an informed decision with respect to the alternatives presented in the NI PEIS. DOE mailed this document to about 730 interested parties on August 24, 2000. The report was made available immediately upon release on the NE web site (<http://www.nuclear.gov>) and in the public reading rooms. DOE has also provided a summary of the Cost Report in Appendix P in the Final NI PEIS.

121-2: DOE notes the commentor's opinion.

121-3: DOE notes the commentor's support for Alternative 1, Restart FFTF.

121-4: The waste generated from target processing and fabrication, regardless of which alternative is considered, are very common and in most cases the volumes are the same.

The NI PEIS addressed the environmental impacts due to the treatment, storage, and disposal of the waste generated by the proposed actions for all alternatives and alternative options. Waste minimization programs at each of the proposed sites are also addressed. These programs will be implemented for the alternative selected in the Record of Decision. The waste generated from any of the proposed alternatives in the NI PEIS will be managed (i.e., treated, stored and disposed) in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws and regulations and applicable DOE orders.

121-5: The impact assessment of the electrical demands of Alternative 3 on the local electrical grid is a site specific assessment and will be evaluated during subsequent NEPA review if the Record of Decision selects Alternative 3. The annual cost of utilities for operation of the high-energy and low-energy accelerators are presented on pages A-3 and A-4 of the Cost Report. The Cost Report summary is provided in Appendix P.

Commentor No. 122: Lillie McDaniel

Response to Commentor No. 122

Draft PEIS Comment Form

*We need FFTF please restart it
Let's save life, science & sanity
Please*

122-1

122-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

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- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): *Lillie McDaniel*

Organization: _____

Home/Organization Address (circle one): _____

City: *Wash* State: *TX* Zip Code: *76112*

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

Commentor No. 123: Tom and Susan Crawford

Draft PEIS Comment Form

We need FFTE —
please restart it!

123-1

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

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- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Tom + Susan Crawford

Organization: _____

Home Organization Address (circle one): _____

City: Richland State: WA Zip Code: 99352

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

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E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



7/12/00

Response to Commentor No. 123

123-1: DOE notes the commentor's support for Alternative 1, Restart FFTE.

Commentor No. 124: Vicki Buck

Response to Commentor No. 124

Draft PEIS Comment Form

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

The operation of The FFTF plant is vital to our community.

It produces a variety of isotopes that is helpful to the American people.

Our community has accepted this plant and we hope you do not waste our tax dollars to build a new one.

Please restart FFTF for the good of the entire country.

124-1

124-1: DOE notes the commentor's support for Alternative 1, Restart FFTF and opposition to Alternative 4, Construct New Research Reactor.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional):

Vicki Buck

Organization:

Home/Organization Address (circle one):

1935 Pine

City:

Richland

State:

WA

Zip Code:

99352

Telephone (optional):

E-mail (optional):

COMMENTS MUST BE POSTMARKED BY September 11, 2000

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U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



7/12/00

Commentor No. 125: NoNa Land

Draft PEIS Comment Form

W. Wood Inert Flux Test Facility
(F.F.T.F.)

125-1

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): *NoNa Land*

Organization: _____

Home/Organization Address (circle one): *Box 1, Box 146B*

City: *Comanche* State: *TX* Zip Code: *76442*

Telephone (optional): *915-356-7148*

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

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U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free Telephone: 1-877-562-4593 • Toll-free Fax: 1-877-562-4592
E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

7/12/00

Response to Commentor No. 125

125-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 126: James W. Daughtry

Response to Commentor No. 126

Draft PEIS Comment Form

I am providing the following comments in support of future operation of the Fast Flux Test Facility (FFTF) at DOE's Hanford site in Washington state. The FFTF is DOE's newest nuclear reactor and numerous studies have demonstrated its unique characteristics and exceptional versatility.

For example, this facility has the capability to produce plutonium-238 for the Radioisotope Thermal Generators (RTGs) that NASA will need for future deep-space missions while simultaneously producing large quantities of medical isotopes for use in diagnosis and treatment of disease.

As always happens, there is vocal opposition to an activity that can in any way be called "nuclear", even though that activity would lead to the production of isotopes for treatment of serious medical conditions such as cancer, heart disease and arthritis. However, you will find strong support from those most directly affected by the decision on the future of the FFTF. Don't waste this valuable asset - put the FFTF back into useful operation.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): JAMES W. DAUGHTRY

Organization: _____

Home/Work Address (circle one): _____

44401 SHANNON LANE

City: WEST RICHLAND State: WA Zip Code: 99353

Telephone (optional): (509) 967-3311

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

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U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free telephone: 1-877-562-4593 • Toll-free fax: 1-877-562-4592
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



126-1

126-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 127: R. Maddox

Draft PEIS Comment Form

DEAR LADIES AND GENTLEMEN:

WE NEED FFTF, PLEASE RESTART IT. THE WELL-KNOWN AXIOM, "LEAD, FOLLOW, OR GET OUT OF THE WAY" HAS ALWAYS BEEN THE STANDARD BY WHICH SOCIAL, MEDICAL AND TECHNOLOGICAL ADVANCES HAVE BEEN MADE IN THE UNITED STATES. DISCONTINUING OPERATION OF FFTF WOULD NOT ONLY DO A DISGRACE TO THE MEN AND WOMEN WHO DEVELOPED AND WORKED AT THE SITE, BUT WOULD SEND AN EMBARRASSING MESSAGE TO THE REST OF THE WORLD WHO LOOK TO OUR COUNTRY FOR LEADERSHIP... "LEAD (US) BECAUSE WE HAVE TO FOLLOW YOUR NOW, AND DON'T WANT TO GET IN YOUR WAY."

PLEASE BASE THE DECISION ON A VISION FOR THE FUTURE. MEDICAL RESEARCH, SPACE EXPLORATION, ETC. WILL ALL BE ADVERSELY AFFECTED BY THE CLOSURE OF FFTF. I, FOR ONE, DO NOT WANT TO SOMEDAY BE IN NEED OF LIFESAVING TREATMENTS THAT HAVE TO BE PURCHASED AT A FOREIGN GARAGE SALE, BECAUSE OUR COUNTRY NO LONGER PRODUCES THE NECESSARY MATERIALS.

LISTEN TO THE PEOPLE. BASE YOUR DECISION(S) ON THEIR NEEDS AND FUTURE NEEDS. THANK YOU.

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
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- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): R. Maddox

Organization: _____

Home/Organization Address (circle one): _____

City: BEND State: OR Zip Code: _____

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
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E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Response to Commentor No. 127

127-1

127-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 128: Paul Moyer

Response to Commentor No. 128

Draft PEIS Comment Form

Ms. BROWN,

5/20/0

The recent release of the National Research Council's study of U.S. Nuclear Waste Sites CALLS DOE'S CLEANUP APPROACH INADEQUATE (Wall Street Journal 5/10) reaffirms what we know. It is paramount that we clean-up our wastes before we even consider creating more. The DOE has been mandated this responsibility.

It is our duty as adults to actualize what our parents taught us; Be kind to others, learn as much as we can, clean-up our mess. This is imperative to the health of future generations. Products from Nuclear Energy Sites are simply not worth the certain hazards of their by-products.

According to the report, "Today's SCIENTIFIC KNOWLEDGE and TECHNICAL and INSTITUTIONAL CAPABILITIES ARE INSUFFICIENT TO PROVIDE MUCH CONFIDENCE THAT SITES WITH RESIDUAL RISKS WILL CONTINUE TO FUNCTION AS EXPECTED FOR THE TIME PERIODS NECESSARY."

Sincerely, Paul Moyer
* PLEASE READ: UNDERTAIN HEARDS
ENVIRONMENTAL ACTIVISTS and
SCIENTIFIC PROOF BY SOLVING NUCLEAR WASTE
©2000 CORNELL UNIVERSITY

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- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional): Paul Moyer PA-C, RN, MPH

Organization: (none) → U.S. CITIZEN, period.

Home/Organization Address (circle one): PO. Box 930

477 NE. Academy St.

City: White Salmon State: WA Zip Code: 98672

Telephone (optional): (509) 493-1029

E-mail (optional): essmoy@gorge.net

COMMENTS MUST BE POSTMARKED BY September 11, 2000

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E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



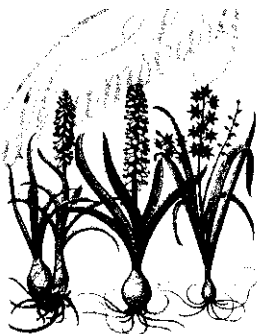
7/12/00

128-1

128-1: DOE notes the commentor's concern for the adequacy of ongoing cleanup activities, although issues of waste cleanup activities are beyond the scope of this NI PEIS. As discussed in Chapter 4 of Volume 1 (e.g., Sections 4.3.1.1.13, 4.3.2.1.13, 4.3.3.1.13), waste will be generated by all of the proposed alternatives, including the No Action Alternative. The NI PEIS addressed the environmental impacts due to the treatment, storage, and disposal of the waste generated by the proposed actions for all alternatives and alternative options. Waste minimization programs at each of the proposed sites are also addressed. These programs will be implemented for the alternative selected in the Record of Decision. DOE activities associated with this program would not impact the schedule or available funding for existing cleanup activities at candidate sites for implementation of the nuclear infrastructure alternatives.

As DOE is mandated to do cleanup, it is also mandated to provide for certain needs under the Atomic Energy Act. Consistent with its mandates under the Atomic Energy Act, DOE is proposing this enhancement for the purposes of addressing three primary needs: 1) to support the increased domestic production of isotopes for medical, research, and industrial uses, as initially identified by a panel of experts in the medical field and reaffirmed by the Nuclear Energy Research Advisory Committee; 2) to support future NASA space exploration missions by re-establishing a domestic capability to produce plutonium-238 a fuel source that is required for deep space missions and for which the U.S. has no long-term, assured supply; and 3) to support civilian nuclear energy research and development in order to maintain the clean, safe, and reliable use of nuclear power as a viable component of the United States' energy portfolio.

Commentor No. 129: Sandra Lewis



Aug 23, 2000

To Whom It Concerns,

We need to keep the project
FFTF.

Please consider the future
need of the people. If a job
is done properly & correctly
& overseen properly, this is a
good asset for all.

Thank you! Sandra Lewis
3282 Alameda Ln.
McKinney, Tex.
75069



Response to Commentor No. 129

129-1

129-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 130: Wayne H. Payzant

Aug. 23, 2000

Ms. Colette E. Brown
U.S. Department of Energy
Office of Space and Defense Power Systems, NE-50
Germantown Road, Germantown, Maryland 20874-1290

Dear Ms. Brown:

Subject: Comments on Draft Nuclear Infrastructure FEIS (DOE/EIS-0310D, July 2000)

The alternatives listed in the referenced document are:

No Action

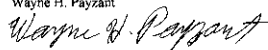
1. Restart FFTF at Hanford, Washington, to meet all isotope production and research requirements.
2. Use only existing operational facilities;
3. Construct one or two new accelerators;
4. Construct a new research reactor; or
5. Permanently deactivate FFTF (with no new missions).

Of these alternatives I strongly support Number 1, restart FFTF. The reasons are:

- A. We need the medical isotopes the FFTF can deliver. No other alternative can deliver the quantity and diversity of isotopes as economically as the FFTF. No patient should be denied life saving/enhancing treatment for lack of adequate medical isotopes. A large diversity of medical isotopes are needed to develop new and improved methodologies to treat diseases.
- B. The FFTF can produce adequate quantities of power generating isotopes to support NASA space missions.
- C. The FFTF has the flexibility to support other nuclear research and development that likely will be needed in the future.
- D. The FFTF is a Crown Jewel in the DOE reactor inventory; being the newest with an excellent operation history.
- E. Skilled nuclear workers are available in the communities near the FFTF reactor. This will minimize the time and cost to recruit and train additional personnel to restart and operate the FFTF.
- F. The local communities near the FFTF reactor strongly support restarting the FFTF.

In summary, restart of the FFTF appears to be the best economic and practical alternative to meet all the needs identified. The final decision should be made on "Sound Science and Long Term Economics" not the lies and fear tactics employed by the anti-nuclear movement.

Sincerely,
Wayne H. Payzant



1717 S. Lyle Street
Kennewick, WA 99337

130-1

Response to Commentor No. 130

130-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 131: Faustina Pakkianathan

Draft PEIS Comment Form

I believe we need FFTF, please restart it.
The nuclear policies of the government can only be described as completely nuclear hostile. These policies appear to be based on the paranoia of uneducated and emotional environmentalists and on the opinion of media coverage-driven celebrities. The result of feeding the American public's perceived fascination with sensationalism is our leaving a legacy to our posterity that is arguably down-right criminal! Turning our back on nuclear technology and science is crippling our nation. The absence of funding has created an absence of nuclear research which has already put the United States behind other nations, and will eventually put us so far behind our very future will be endangered. It is high time that those who make our nuclear policies base their decisions not on people who irrationally fear it, or who want to profit by its demise, but on hard science and on the advice of engineers and scientists who actually work with and study it. I am asking that we please take this one small step to reverse the wave of dementia: restart the FFTF!

131-1

131-2

131-1

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- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov

Name (optional): Faustina Pakkianathan

Organization: _____

Home/Organization Address (circle one): 994 Kimberly LnCity: Ridgester State: CA Zip Code: 95355

Telephone (optional): _____

E-mail (optional): _____

COMMENTS MUST BE POSTMARKED BY September 11, 2000

For more information contact: Colette E. Brown, NE-50
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
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E-mail: Nuclear.Infrastructure-PEIS@hq.doe.gov



NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT



Response to Commentor No. 131

131-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

131-2: DOE notes the views expressed in this comment. DOE remains committed to fulfilling its roles in technology development, energy security and environmental stewardship, while meeting the Nation's needs in the areas of medical and industrial isotopes, and nuclear research.

Commentor No. 132: J. Hyatt

Please Restart FFTF for Medical Isotopes!
J. Hyatt - Las Vegas

WHY DO WE NEED THE FFTF FOR MEDICAL ISOTOPES?

June, 2000

Medical Isotopes Are Improving Cancer Treatment

New treatments for cancer using medical isotopes are showing great promise in human clinical trials. A new medical isotope treatment for non-Hodgkin's lymphoma is having remarkable results – impressive remission rates and few side effects. Medical isotope "seeds" for prostate cancer, now FDA approved, are equally as effective as surgery for localized cancer yet much cheaper and kinder. The list of possible treatments using medical isotopes is growing – leukemia, breast cancer, ovarian cancer, myeloma, neuroendocrine cancers to name a few.

Will there be a shortage of medical isotopes for treatment?

The threat of a medical isotope shortage for treating patients is real. The quantity of isotopes required for research (treating only a few patients) is much smaller than the quantity that will be required when the treatment becomes FDA approved. In the next several years, demand for certain medical isotopes may skyrocket as a result of their excellent performance in clinical trials. Will we be ready or will we have to turn patients down while we scramble for a good source of a large quantity of medical isotopes?

The Fast Flux Test Facility has the capacity to produce 2-3 times more medical isotopes than all other reactors in the nation combined. We need it to be ready to supply large quantities of medical isotopes to cancer centers around the nation.

Is there a shortage of medical isotopes for research?

There are many different kinds of isotopes, and each isotope has different qualities that make it ideal for one use, but less ideal for another. Currently cancer researchers are not able to select from every possible isotope because only certain ones are available. This means that the course of cancer research is influenced by market conditions, and not solely by what makes the most sense scientifically and medically.

How do you quantify lost potential? Some have been quoted as saying there is no medical isotope shortage. All the isotopes that could be developed for cancer treatment are clearly not available. If they're not available, they won't be developed. If they're not developed, we have not done all we can to fight cancer.

Have isotope shortages interrupted the progress of innovative cancer therapies?

Yes. Following are 3 specific examples.

Copper-67. Copper-67 is a beta isotope that has shown excellent promise for treating cancer with radioimmunotherapy (RIT). In RIT, isotopes are paired with an antibody that is engineered to seek out certain cells in the body. The isotopes ride along as the antibody flows through the blood. When it reaches the cancer, the isotope zaps the cancer cells. In 1997, Dr. Sally DeNardo & Dr. Gerald DeNardo of U-C Davis were forced to abort a promising clinical trial using Cu-67 on non-Hodgkin's lymphoma because they could not obtain enough of this isotope.

Response to Commentor No. 132

132-1

132-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 132: J. Hyatt (Cont'd)

The FFTF reactor could produce enough Copper-67 for worthy cancer research such as this.

Alpha emitters. Alpha emitting isotopes (alphas) have great potential for treating blood cancers (leukemia, lymphoma, multiple myeloma) and micrometastatic deposits of cancer (any type of cancer that has spread throughout the body in small clusters of cells). Because alpha emitters can kill a cancer cell in as few as 1 or 2 hits, they might be developed into very effective treatments for metastatic cancer. Alphas paired with pre-engineered antibodies become a "seek and destroy" missile for cancer cells.

Research and clinical trials with alpha emitters is bottlenecked by serious supply problems. Dr. Darrell Fisher of Pacific Northwest National Laboratory describes the alpha emitter supply as "tight or virtually non-existent." Dr. David Scheinberg of Memorial Sloan Kettering Cancer Center in New York began human clinical trials against leukemia with the alpha isotope Bismuth-213 attached to a monoclonal antibody. Unfortunately, limited isotope supply and current high costs have slowed expansion of alpha emitters into other trials.

Will the potential of alpha emitting isotopes be tapped to benefit patients? The FFTF reactor could produce large quantities of the needed alpha emitting isotopes.

High Specific Activity Iodine-131.

Iodine-131 is an isotope that has been utilized more than any other in developing new cancer treatments. When isotope treatment for thyroid cancer was developed 30 years ago, Iodine-131 was used because it naturally sought out thyroid tissue. It is now the standard of care for thyroid cancer treatment. Iodine-131 currently shows great promise in advanced clinical trials against B-cell non-Hodgkin's lymphoma, with FDA approval expected soon. Many other beneficial diagnostic and treatment uses have been developed and are continuing to grow.

High specific activity Iodine-131 is completely unavailable in the United States. The high specific activity isotope is much purer and therefore more effective than the low specific activity product that is now so widely used. When used in radioimmunotherapy, low specific activity Iodine-131 actually wastes about 90% of the available antibodies. Patients treated with these isotope mixes receive only 10% or so of the right isotope at the cancer site. A high specific activity product would cut the waste down to only 30 or 40%, potentially making a great difference in the effectiveness of the treatment.

The only reactor in the Western Hemisphere capable of producing large quantities of several high specific activity isotopes is the FFTF. The PNNL medical isotope program receives calls from researchers waiting for such isotopes as high specific activity Iodine-131.

Is Research and Development Hampered by Isotope Supply Problems?

Research utilizing medical isotopes is stuck in a "chicken & the egg" situation. Research isotopes can be made available when their promise in medical treatments is demonstrated. Researchers cannot demonstrate their promise without a reliable supply. Dr. Darrell Fisher believes "the growth in market demand for medical isotopes will be forever directly linked to isotope availability, and the market will increase with our increasing ability to produce high quality isotopes for special-purpose applications."

Many innovative cancer treatments are developed by pharmaceutical companies. Developing a new drug requires a heavy up-front research and development investment. No company would ever put heavy financial investment into a potential treatment when the drug development could be aborted by shortages.

What are we waiting for? If we expect more effective, less debilitating cancer treatments for the future, we need to invest in isotope availability now. We need the FFTF for medical isotopes.

Response to Commentor No. 132

Commentor No. 133: Chris Hofgren

Hanford Watch
2285 SE Cypress
Portland, Oregon 97214



Ms. Colette Brown
U.S. Department of Energy
Office of Space and Defense Power Systems
NE-50
19901 Germantown Road
Germantown, Maryland 20874-1290

20874-1290 A standard postal barcode is located below the address.

Public comment on Nuclear Infrastructure Draft Programmatic Environmental Impact Statement (NI PEIS)

Dear Ms. Brown:

I am opposed to restart of the Fast Flux Test Facility reactor because:

- ① SIPHONS FUNDS AWAY FROM OVERALL HANFORD CLEANUP
- ② REACTOR VESSEL HAS SEVERE STRUCTURAL PROBLEMS - SHUT DOWN FFTF!
- ③ MIXED OXIDE FUELS CREATE GREATER WASTE STREAM PROBLEMS

Name Chris Hofgren
Address 2434 SE Ankeny #16
City, state Portland, OR Zip 97214

Response to Commentor No. 133

133-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

133-2: DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected. Therefore, the missions delineated in the NI PEIS would not have an impact on Hanford cleanup activities.

133-3: The NI PEIS has incorporated all relevant information from facility safety analysis reports regarding the condition of the FFTF. The entire facility, including the reactor vessel, is considered to be in excellent condition and can be safely operated to support the nuclear infrastructure missions described in Section 1.2 of Volume 1.

133-4: As stated in Section 4.3.4.1.13 of the NI PEIS, "...the waste generation would not be affected by the type of fuel used (i.e., mixed oxide or highly enriched uranium)..."

Commentor No. 138: Noella Wyatt
Career Development Services

From: Noella Wyatt[SMTP:NOELLA.WYATT@CWU.EDU]
 Sent: Monday, August 28, 2000 5:23:28 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Cc: Dick@tpqs.com%internet
 Subject: FFTF Restart
 Auto forwarded by a Rule

Ladies and Gentlemen,

I have limited knowledge about this program. The knowledge that I do have leads me to write this short missive. Fifteen and one_half years ago, I lost my mother to cancer. The disease, itself, was horrible, but the torture of undergoing chemo and radiation therapy was devastating. As she slowly wasted away, she lost her ability to even care for herself. Do you have any idea how humiliating it is to have your daughter wipe and clean you after going to the bathroom? Do you have any idea how sad it is to have to do that for your parent?

As a result of her chemo and radiation, she lost more than weight. She lost clear speech and thought. No longer was she the quick joker of the family, the one who digs out the catcher's mitt for Thanksgiving Dinner when we were throwing rolls acrossed the table. No longer was she the one with the trigger memory who could tell you all about uncle or aunt so_and_so and who their kids were and their kids' names. No longer was she the daredevil who put on her ice skates and skated down the city street in the winter or borrowed one of the neighbor kids' skateboards to run down the sidewalk. No longer did she have any appetite for her favorite foods _ food was disgusting to her. By the time she felt decent again following chemo, it was time for another dose. Long before my mother died of cancer, she started dying from the treatments intended to put that cancer into remission. My mother's last two+ years of life were years of pain, misery, and torture.

138-1

Response to Commentor No. 138

138-1: DOE notes the commentor's support for greater availability of medical isotopes. For nearly 50 years, DOE's use of its unique technologies and capabilities to develop isotopes for civilian purposes has enabled the widespread application of medical isotopes seen today. Consistent with the mandates under the Atomic Energy Act, DOE seeks to maintain and enhance its infrastructure to support production of radioisotopes for medical applications and research.

Commentor No. 138: Noella Wyatt (Cont'd)
Career Development Services

Would you like some imagery? How about seeing a woman who once had the most beautiful head of rich, lusturous red hair have one small (quarter_size) patch of stiff gray hair on her head? How about a woman who's cancer had advanced to the point that almost all of her teeth had fallen out? How about a woman who died at the weight of 73 pounds? Are any of the images coming into focus? How about a woman desperately trying to stay alive to just be able to see her first born grandchild (she died 4 months too early)? Can you imagine a woman with hands that resembled claws because there was no flesh left on them? Can you see my mother who was so emaciated and in so much pain that she couldn't stand to sleep in bed because rolling over was agony? Have you seen someone you love pulled up into a fetal position because their body is racked with pain?

If you can imagine any of this.....if you have experienced any of this....how can you NOT move Heaven and earth (even HELL) to make Medical Isotopes available to anyone who needs it? How can you deny the opportunity for a CURE? Not a remimssion. To hell with remission. I'm asking for a cure. And that cure is there _ it is available _ but not if it isn't made available. It makes me ill to think that people are still going through the barbaric practice of chemo therapy and radiation when medical isotopes could be used. WHY is this still being done? Why aren't the isotopes available? FAT_ASSED BEAUROCRATS AND PHYSICIANS!!! Who would sponsor the research? Where would the doctors get their money? If the cure came too quickly, how could they afford their Corvette or Bayliner? How could they send their kids to the best schools?

138-1
(Cont'd)

Response to Commentor No. 138

Commentor No. 138: Noella Wyatt (Cont'd)
Career Development Services

This may be unlady_like, but BULLSHIT! My mother suffered horribly. I do NOT want to watch someone else I love go through this living hell on earth. I thank you for your time in reading this. To remember the pain and agony our entire family went through brings back the old hurts and the tears. Please, help to make medical isotopes available for everyone so that no other person has to sit and watch their mother, father, sister, brother, husband, wife, son or daughter or friend go through this hell.

**138-1
(Cont'd)**

Noella Wyatt
Career Development Services
Barge 202
CWU_MS/7499
963_2404

The Value of a smile
It costs nothing but creates much.
It enriches those who receive, without impoverishing those who give.
It happens in a flash and the memory of it sometimes lasts forever.
None are so rich that they can get along without it, and none
are so poor, but richer for a smile.

Response to Commentor No. 138

Commentor No. 139: Clark and Louise McKee

From: ClarkMcKee@aol.com%internet
[SMTP:CLARKMCKEE@AOL.COM]
Sent: Monday, August 28, 2000 8:10:40 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: FFTF
Auto forwarded by a Rule

Please re_start the FFTF for medical isotope production.

Very truly yours,

Clark & Louise McKee

|| 139-1

Response to Commentor No. 139

139-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 140: Kathryn L. Orren

From: Bhorren@aol.com%internet
[SMTP:BHORREN@AOL.COM]
Sent: Monday, August 28, 2000 9:17:04 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: (no subject)
Auto forwarded by a Rule

Please re_start FFTF for Medical Isotopes.

Thank you, Kathryn L. Orren

140-1

Response to Commentor No. 140

140-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 141: Ann Minks

From: Ann Minks[SMTP:AMINKS@QUALDATA.COM]
 Sent: Monday, August 28, 2000 9:39:52 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: objection to restarting Hanford nuclear reactor
 Auto forwarded by a Rule

Dear Collette Brown/Secretary Richardson and committee members,

Please accept the following as public comments on the Draft Environmental Impact Statement on the Nuclear Infrastructure EIS.

As a citizen of the Pacific Northwest, I am deeply concerned about the United States Department of Energy's proposal to restart Hanford's Fast Flux Test Facility Nuclear Reactor. I wish to have my values incorporated into the formal administrative record and taken into consideration when adopting the final record of decision. I also want you to respond to my concerns before you make your record of decision.

Considering Hanford's overwhelming problems, including the crisis with tank waste treatment, as well as the damage caused by and radiation released from the Hanford wildfire, restarting FFTF is absolutely unacceptable. We must deal with the waste already at Hanford and focus on the clean_up mission. FFTF maintenance has already gobbled up \$100 million in clean_up money and distracted from desperately needed clean_up. Tank wastes are already seeping towards the Columbia River. More wastes must not be added to those tanks. Clean_up must be the only priority. We must save the Columbia River.

Also, I object to the fact that you are asking citizens to comment on an incomplete study. You have not told us how you will deal with non_proliferation issues or additional waste from FFTF. Should FFTF be restarted, that decision will be illegal under Federal law and will be overturned! Do the right thing, shut down FFTF now and save the future of the Columbia River!

Sincerely,
 Ann Minks

141-1

141-2

141-3

141-2

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141-4

141-1

141-5

Response to Commentor No. 141

141-1: DOE notes the commentor's concerns. This NI PEIS has been prepared in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and the related CEQ and DOE implementation regulations (40 CFR Parts 1500 through 1508 and 10 CFR Part 1021), respectively. DOE prepared a separate Nuclear Infrastructure Nonproliferation Impact Assessment to provide additional pertinent information to the Secretary of Energy so that he may make an informed decision with respect to the alternatives presented in the NI PEIS. Pursuant to CEQ regulations (40 CFR 1505.1(e)), agencies are encouraged to make ancillary decision documents available to the public before a decision is made. DOE mailed this document to approximately 730 interested parties on September 8, 2000. The report was made available immediately upon release on the NE web site (<http://www.nuclear.gov>) and in the public reading rooms. DOE has also provided a summary of the Nuclear Infrastructure Nonproliferation Impact Assessment in Appendix Q in the Final NI PEIS. DOE gave equal consideration to all comments. In preparing the Final NI PEIS, DOE carefully considered comments received from the public.

141-2: DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

DOE-RL, EPA, and Ecology agreed to a change in this agreement to place the milestones for FFTF's permanent deactivation in abeyance until the DOE reaches a decision on FFTF's future. Public meetings were held on this formal milestone change.

The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the

Commentor No. 141: Ann Minks (Cont'd)

Response to Commentor No. 141

alternative(s) selected. Therefore, the NI PEIS missions would not have an impact on Hanford cleanup activities.

No waste would be added to Hanford's underground waste tanks if FFTF were restarted for this mission.

No radioactive materials were "released" in the Hanford Wildfires of 2000. Wildfires did resuspend some materials already in the environment. The resuspended materials were low, slightly above natural background levels. The low levels required several days of analysis to quantify.

141-3: DOE notes the commentor's opposition to Alternative 1, Restart FFTF, and support for Alternative 5, Permanently Deactivate FFTF.

141-4: Management of wastes that would be generated under implementation of Alternative 1, Restart FFTF, is discussed in Section 4.3 of Volume 1 (e.g., see Section 4.3.1.1.13). Section 4.3.1.1.13 was revised to clarify that, the Hanford waste management infrastructure is analyzed in this PEIS for the management of waste resulting from FFTF restart and operation. This analysis is consistent with policy and DOE Order 435.1, that DOE radioactive waste shall be treated, stored, and in the case of low-level waste, disposed of at the site where the waste is generated, if practical; or at another DOE facility. However, if DOE determines that use of the Hanford waste management infrastructure or other DOE sites is not practical or cost effective, DOE may issue an exemption under DOE Order 435.1 for the use of non-DOE facilities (i.e., commercial facilities) to store, treat, and dispose of such waste generated from the restart and operation of FFTF. In addition, Section 4.3.3.1.13 and 4.4.3.1.13 also address the potential impacts associated with the waste generated from the target fabrication and processing in FMEF and how this waste would be managed at the site.

141-5: See response to comment 141-3. FFTF is approximately 4.5 miles from the Columbia River. There are no discharges to the river from FFTF and no radioactive or hazardous discharges to groundwater. As indicated in analyses presented in Chapter 4 of Volume 1 (e.g., Sections 4.3.1.1.4, 4.3.1.4, 4.4.3.1.4, 4.5.3.2.4, and 4.6.3.2.4), there would be no discernible impacts to groundwater or surface water quality at Hanford from operation of Hanford facilities that would support the nuclear infrastructure missions described in Section 1.2 of Volume 1.

Commentor No. 142: Brandon Juhl

From: Brandon Juhl[SMTP:BRANDONJUHL@HOTMAIL.COM]
 Sent: Monday, August 28, 2000 8:49:32 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: don't re_start the Hanford tritium FFTF reactor!
 Auto forwarded by a Rule

Dear Department of Energy:

What are you thinking? You already don't know what to do with the nuclear waste you HAVE, WHY on EARTH would you want to make MORE?

In the wake of a fire and a plutonium release, the firing of a contractor at Hanford for incompetence, delays, and other such madness and nonsense, you now have the gall to try to restart the FFTF reactor?

Plutonium 238__a speck of which, inhaled, will KILL YOU, is so deadly and dangerous I can't imagine why anyone would want to make it. Oh, so you want to use it to create medical isotopes to "cure cancer."

Maybe there wouldn't be so many cases of cancer if you would stop producing nuclear radioactive waste! Also, medical isotopes are widely available on the commercial market, at far cheaper costs than what the FFTF would ever produce.

Your justification for profitability (in restarting the reactor) assumed a steady 16% increase annually in the demand for medical isotopes, which means every person in the U.S. will need to have need for cancer treatment by the year 2030.

142-1

142-2

142-3

142-4

Response to Commentor No. 142

142-1: DOE notes the commentor's concern about waste generation. The NI PEIS addressed the environmental impacts due to the treatment, storage, and disposal of the waste generated by the proposed actions for all alternatives and alternative options. Waste minimization programs at each of the proposed sites are also addressed. These programs will be implemented for the alternative selected in the Record of Decision. The waste generated from any of the proposed alternatives in the NI PEIS will be managed (i.e., treated, stored and disposed) in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws and regulations and appropriate DOE orders.

142-2: DOE notes the commentor's opposition to Alternative 1, Restart FFTF. Direct effects of the referenced fire on the land and biota are addressed in this NI PEIS consistent with the scope of the affected environment descriptions for the Hanford Site provided in Section 3.4 of Volume 1. The secondary effects of the Hanford Wildfires of June 27-July 2, 2000 are beyond the scope of this NI PEIS. No radioactive materials were "released" in the Hanford Wildfires of 2000. Wildfires did resuspend some materials already in the environment. The resuspended materials were low, slightly above natural background levels. The low levels required several days of analysis to quantify.

FFTF can be safely operated to support the nuclear infrastructure missions described in Section 1.2 of Volume 1. The analyses presented in this NI PEIS reflect the proposed changes to the reactor core (including fuel and irradiation targets) to perform the DOE missions. In the event that FFTF restart is selected in the Record of Decision, a new Safety Analysis Report, including a Probabilistic Risk Assessment (PRA), will be prepared and it will address any changes in plant configuration, operating conditions and procedures. The revised safety analyses will be subjected to a thorough independent review process. DOE's Record of Decision for the NI PEIS will be based on a number of factors including environmental impacts, public input, costs, nonproliferation impacts, schedules, technical assurance, and other policy and programmatic objectives.

142-3: The commentor's concerns over the production of plutonium-238 are noted. As discussed in Section 1.2.2 of Volume 1, plutonium-238 produced under Alternatives 1 through 4 (described in Section 2.5) would be used to support NASA's deep space missions. NASA uses plutonium-238 sources when these sources enable their missions or

Commentor No. 142: Brandon Juhl (Cont'd)

The restart also undermines efforts (along with the Star Wars national missile defense program) to halt nuclear proliferation, and violates disarmament treaties!

142-5

In the last few months you've lied about how much plutonium was released into the air (during the June 27th fire) so why on Earth should we believe your assurances about the re_start of the FFTF that it is 'safe'?

142-6

Face it, DOE, your proposal to re_start the FFTF reactor at Hanford should be DOA. Kill it now, before it kills us all.

142-2

Sincerely,

Brandon Juhl
4638 90th Ave SE
Mercer Island, WA 98040

Response to Commentor No. 142

enhance mission capabilities. Prior to launch, NASA provides evaluations of the environmental impacts associated with their deep space missions in compliance with the National Environmental Policy Act.

Sections 4.2-4.6 of Volume 1 provide the results of the evaluation of potential health impacts that would be expected to result from implementation of the alternatives, including normal operations and a spectrum of accidents that included severe accidents. The environmental analysis showed that radiological and nonradiological risks associated with each alternative would be small.

142-4: The restart of FFTF would generate some additional wastes. It is DOE's policy that all wastes be managed (i.e., treated, stored and disposed) in a safe and environmentally protective manner and in compliance with all applicable Federal and state laws, regulations, and applicable DOE orders.

DOE notes that private commercial vendors could produce a select set of isotopes that are economically attractive. It is not DOE's intent to enter into competition with the commercial sector in the production of isotopes. Rather, it is the intent of DOE to complement commercial sector capabilities to ensure that a reliable supply of isotopes is available in the United States to meet future demand, and to encourage the commercial sector to privatize the production of isotopes that have established applications to a level that would support commercial ventures.

DOE has sought independent analysis of trends in the use of medical isotopes, and of its continuing role in this sector, consistent with its mandates under the Atomic Energy Act. In doing so, it established two expert bodies, the Expert Panel and the NERAC. In 1998, the Expert Panel, which convened to forecast future demand for medical isotopes, estimated that the expected growth rate of medical isotope use during the next 20 years would range from 7 to 14 percent per year for therapeutic applications, and 7 to 16 percent per year for diagnostic applications. These findings were later reviewed and endorsed by NERAC, established in 1999 to provide DOE with expert, objective advice regarding the future form of its isotope research and production activities. DOE has adopted these growth projections as a planning tool for evaluating the potential capability of the existing nuclear facility infrastructure to meet programmatic requirements. In the period since the initial estimates were made, the actual growth of medical isotope has tracked at levels consistent with the Expert Panel findings. Section 1.2.1

Commentor No. 142: Brandon Juhl (Cont'd)

Response to Commentor No. 142

of Volume 1 was revised to incorporate this information and to clarify DOE's role in fulfilling the U.S. research and commercial isotope production needs.

- 142-5:** The proposed action in the NI PEIS is consistent with and supports nuclear nonproliferation policy. Clearly, the evaluated alternatives do not violate any existing disarmament treaty. An assessment of the potential nonproliferation impacts of proposed isotope production and nuclear research missions, published in September 2000, confirms there are currently no U.S. nonproliferation policies, laws, regulations, or international agreements that preclude the use of any of the evaluated facilities in the manner described in the PEIS, including the potential restart of the FFTF. This nonproliferation impact assessment was managed and approved by the DOE Office of Arms Control and Nonproliferation.
- 142-6:** See comment 142-2.

Commentor No. 143: Alana LaRock

From: larock[SMTP:LAROCK@IN_TCH.COM]
Sent: Tuesday, August 29, 2000 9:33:48 AM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: FFTF
Auto forwarded by a Rule

Please restart the FFTF. This is so important to all of us.

Thank you. Alana LaRock

Real Estate Diva for the Butte and Canyon Ferry Areas
<<http://www.alanalarock.com>>
Member NAR, MAR, Butte Board of Realtors & MLS

143-1***Response to Commentor No. 143:***

143-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 144: Cal Greer

From: jcgreer[SMTP:JGREER12@EMAIL.MSN.COM]
Sent: Monday, August 28, 2000 10:33:58 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: FFTF
Auto forwarded by a Rule

Please re_start FFTF for the production of medical isotopes.

Thank you
Cal Greer

144-1***Response to Commentor No. 144***

144-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 148: Karsten Hagen

From: Karsten Hagen[SMTP:KARSTEN@SUMMITPROJECTS.COM]
 Sent: Tuesday, August 29, 2000 11:50:20 AM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: No New Reactor
 Auto forwarded by a Rule

To Whom it May Concern,

The crumbling infrastructure at Hanford is no place to house a nuclear reactor of any sort. True, you spend millions of taxpayer dollars annually to maintain a mothballed facility, but at what potential cost to the Columbia Basin?

Please cease and desist any attempt at starting an antiquated and potentially deadly nuclear reactor on the third largest river drainage system in North America. Millions of people depend on it.

Karsten Hagen
 Hood River

148-1

148-2

Response to Commentor No. 148

148-1: The commentor's opposition to the restart of FFTF is noted. FFTF was constructed and initiated operations in the early 1980s making it the DOE's newest reactor. It is in excellent condition and evaluations have been performed to show that it has sufficient life remaining to fully support the 35 year mission. Likewise, the proposed support facilities are either recently constructed or renovated facilities or would be upgraded for these missions.

148-2: FFTF is approximately 4.5 miles from the Columbia River. There are no discharges to the river from FFTF and no radioactive or hazardous discharges to groundwater. Section 3.4.4 of Volume 1 of the NI PEIS describes the current condition of water resources potentially affected by the Hanford Site, with specific discussions of surface water and groundwater resources in the Hanford 400 Area, where FFTF is located, provided in Sections 3.4.4.1.2 and 3.4.4.2.2, respectively. This information indicates that the only impact that 400 Area operations have had on water resources to date is contamination of the unconfined aquifer system with nitrate from sanitary sewage disposal. The source of this contamination has since been removed resulting in nitrate levels diminishing over time. The effects of maintaining FFTF in its current standby mode for 35 years are described in Section 4.2.1.2.4 of Volume 1 and this analysis indicates that the impact on water resources would be negligible. As indicated in analyses presented in Chapter 4 of Volume 1 (e.g., Sections 4.3.1.1.4, 4.3.3.1.4, 4.4.3.1.4, 4.5.3.2.4, and 4.6.3.2.4), there would be no discernible impacts to groundwater or surface water quality at Hanford from operation of Hanford facilities that would support the nuclear infrastructure missions described in Section 1.2 of Volume 1.

FFTF can be safely operated to support the nuclear infrastructure missions described in Section 1.2 of Volume 1. The analyses presented in this NI PEIS reflect the proposed changes to the reactor core (including fuel and irradiation targets) to perform the DOE missions. In the event that FFTF restart is selected in the Record of Decision, a new Safety Analysis Report, including a Probabilistic Risk Assessment (PRA), will be prepared and it will address any changes in plant configuration, operating conditions and procedures. The revised safety analyses will be subjected to a thorough independent review process. DOE's Record of Decision for the NI PEIS will be based on a number of factors including environmental impacts, public input, costs, nonproliferation impacts, schedules, technical assurance, and other policy and programmatic objectives.

Commentor No. 149: Ron Marcolini

NI PEIS Toll_Free Telephone

8/29/00

Ron Marcolini
202_685_5792

I called to say support the Fast Flux Test Facility
for further project work and I believe it is
adequately designed for safety.

149-1

Response to Commentor No. 149

149-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 150: Anonymous

NI PEIS Toll_Free Telephone

8/29/00

Yes, I am calling about the Public Hearing Evaluation Form. The 1st question is:

1. How could the public hearing format and materials be improved?

My answer is: Please listen and take the courage to do what the taxpayer wants, not what the government or businesses want.

2. Was the public hearing helpful to you?

My answer is: No. It is but another repeat of what the public has already expressed. No FFTF startup. Why can't the Secretary of Energy and others listen to us. Are you hoping to wear us down with apathy? That will not happen. People will humanly protest any FFTF startup at the Hanford factory. All isotopes can be purchased from Canada at new facilities. We do not need to make them, but what we need to do is clean up Hanford. All resources and all energy should go to that and nothing else.

150-1

150-2

150-1

150-3

150-4

Response to Commentor No. 150

150-1: DOE policy encourages effective public participation in its decision making process. In compliance with NEPA and CEQ regulations, DOE provided opportunity to the public to comment on the scope of the NI PEIS and the environmental impact analysis of DOE's proposed alternatives. DOE gave equal consideration to all comments. In preparing the Final NI PEIS, DOE carefully considered comments received from the public. DOE's Record of Decision for the NI PEIS will be based on a number of factors including environmental impacts, public input, costs, nonproliferation impacts, schedules, technical assurance, and other policy and programmatic objectives.

150-2: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

150-3: The United States currently purchases approximately 90 percent of its medical isotopes from foreign producers, most notably Canada. However, Canada only supplies a limited number of economically attractive commercial isotopes (primarily molybdenum-99), and it does not supply research isotopes or the diverse array of medical and industrial isotopes considered in the NI PEIS. As such, reliance on Canadian sources of isotopes to satisfy projected U.S. isotope needs would not meet DOE's mission requirements. Section 1.2.1 of Volume 1 has been revised to clarify DOE's isotope production role and other producers' capabilities to fulfill U.S. isotope needs.

150-4: DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram

Commentor No. 150: Anonymous (Cont'd)

Response to Commentor No. 150

budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected.

DOE was tasked by Congress in the Atomic Energy Act of 1954, as amended, to “ensure the availability of isotopes for medical, industrial, and research applications, meeting the nuclear material needs of other federal agencies, and undertaking research and development of activities related to development of nuclear power for civilian use.” The purpose of this PEIS is to determine the environmental and other impacts to accomplishing this mission from all reasonable existing and new DOE resources. The FFTF at the Hanford Site was one of several existing DOE resources that was assessed for this mission.

Commentor No. 151: Denise Wages

NI PEIS Toll_Free Telephone

8/29/00

Denise Wages
662_842_3325

I would like to say please restart FFTF for medical isotopes.

151-1

Response to Commentor No. 151

151-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 152: Karen Gillis

NI PEIS Toll-Free Telephone

8/28/00
Karen Gillis
503_585_9139

I haven't read the EIS or anything, but I know about nuclear waste. OK. Thanks to the TAGprogram, when I was a kid, I learned about what I was interested in sparking off a nonstop environmental activism thing. I just want to make a comment that they have maps all around the Tri_Cities and actually all down the Columbia River showing incidences of thyroid cancer and cleft palate and all kinds of birth defects. The Columbia River way down in there with heavy water going through it, and it is radioactive and my brother was born with a cleft palate. He was born in Astoria and it was a huge mystery or nobody ever knew or guessed my mother never did drugs when she was pregnant. Just like, oh my God, oh my, this horrible thing. Through studying and not even looking for it, trying not to blame anything on it. I just know in my heart from instances of everybody else from the Tri_Cities and around Hanford that have cleft palates. This was nuclear contamination. I figured it was probably from fish that was canned in Astoria that my mom ate. I don't know, but all I know is that my brother has been through 13 incredibly painful operations. I have a friend that has cancer of the eye from the Rocky Mountain Arsenal, which is not nuclear I guess, but it leaked mustard gas and she has eye cancer and one of her sons has eye cancer. So, she doesn't have the cancer anymore because she is missing an eye; she has a glass one.

You know, don't reopen Hanford; it's just retarded. Please care about the people, animals, plants, and our earth. Ok we don't want nuclear power. We don't want nuclear energy. Put your energy into solar energy or something more useful than something that is going to contaminate the land forever. Thanks a lot. I guess that is about all that I have to say. It might not be very scientific, but you know you guys pooh _pooh it all you want, but nuclear radiation causes birth defects and it is not good for people. It causes cancer and everyone knows this. So, don't pretend like you don't know. Just shut it down. Give the American people a break. Please put your energy and money into something that is going to do good for the world, not something that is going to destroy the world. Don't sell out just for a paycheck. Thank you.

152-1

152-2

Response to Commentor No 152

152-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

152-2: The commentor's opposition to nuclear power and nuclear energy is noted. DOE recognizes that there are potentially harmful effects associated with radiation such as cancer and these are quantified for each alternative in Chapter 4 of the PEIS and the results of this analysis are presented in EIS Volume 1, Section 2.7.1. The purpose of this PEIS is to evaluate and present the environmental consequences of a variety of alternatives for the proposed action.

Commentor No. 153: Thomas Marshall

From: Thomas Marshall[SMTP:THOMASM@AVENUEA.COM]
 Sent: Tuesday, August 29, 2000 11:46:19 AM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: Opposed to restart of FFTF
 Auto forwarded by a Rule

Dear Collette Brown/Secretary Richardson,

Please accept the following as public comments on the Draft Environmental Impact Statement on the Nuclear Infrastructure EIS.

As a citizen of the Pacific Northwest, I am deeply concerned about the United States Department of Energy's proposal to restart Hanford's Fast Flux Test Facility Nuclear Reactor. I wish to have my values incorporated into the formal administrative record and taken into consideration when adopting the final record of decision. I also want you to respond to my concerns before you make your record of decision.

Considering Hanford's overwhelming problems, including the crisis with tank waste treatment, as well as the damage caused by and radiation released from the Hanford wildfire, restarting FFTF is absolutely unacceptable. We must deal with the waste already at Hanford and focus on the clean_up mission.

FFTF maintenance has already gobbled up \$100 million in clean_up money and distracted from desperately needed clean_up. Tank wastes are already seeping towards the Columbia River. More wastes must not be added to those tanks.

Clean_up must be the only priority. We must save the Columbia River.

153-1

153-2

153-3

153-2

Response to Commentor No. 153

153-1: DOE notes the commentor's concerns. This NI PEIS has been prepared in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and the related CEQ and DOE implementation regulations (40 CFR Parts 1500 through 1508 and 10 CFR Part 1021), respectively. DOE prepared a separate Nuclear Infrastructure Nonproliferation Impact Assessment to provide additional pertinent information to the Secretary of Energy so that he may make an informed decision with respect to the alternatives presented in the NI PEIS. Pursuant to CEQ regulations (40 CFR 1505.1(e)), agencies are encouraged to make ancillary decision documents available to the public before a decision is made. DOE mailed this document to approximately 730 interested parties on September 8, 2000. The report was made available immediately upon release on the NE web site (<http://www.nuclear.gov>) and in the public reading rooms. DOE has also provided a summary of the Nuclear Infrastructure Nonproliferation Impact Assessment in Appendix Q in the Final NI PEIS. DOE gave equal consideration to all comments. In preparing the Final NI PEIS, DOE carefully considered comments received from the public.

The associated Nuclear Infrastructure Nonproliferation Impact Assessment was made available to the public on September 8, 2000. The Record of Decision concerning enhancement of DOE's nuclear infrastructure is scheduled for January 2001.

153-2: DOE notes the commentor's concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

DOE-RL, EPA, and Ecology agreed to a change in this agreement to place the milestones for FFTF's permanent deactivation in abeyance until the DOE reaches a decision on FFTF's future. Public meetings were held on this formal milestone change.

The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the

Commentor No. 153: Thomas Marshall (Cont'd)

Also, I object to the fact that you are asking citizens to comment on an incomplete study. You have not told us how you will deal with non_proliferation issues or additional waste from FFTF. Should FFTF be restarted, that decision will be illegal under Federal law and will be overturned! Do the right thing, shut down FFTF now and save the future of the Columbia River!

153-1**153-4****153-1****153-5**

And also please support Wild and Scenic status for the Hanford stretch of the mighty Columbia.

153-6

Sincerely,

Tom Marshall
Media Engineer

avenue a
Know what works.

voice: 206.816.8357
fax: 206.816.8808
mailto:thomasm@avenuea.com
http://www.avenuea.com

Response to Commentor No 153

FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected. Therefore, the NI PEIS missions would not have an impact on Hanford cleanup activities.

No waste would be added to Hanford's underground waste tanks if FFTF were restarted for this mission.

No radioactive materials were "released" in the Hanford Wildfires of 2000. Wildfires did resuspend some materials already in the environment. The resuspended materials were low, slightly above natural background levels. The low levels required several days of analysis to quantify.

153-3: DOE notes the commentor's opposition to Alternative 1, Restart FFTF, and support for Alternative 5, Permanently Deactivate FFTF.

153-4: Management of wastes that would be generated under implementation of Alternative 1 (Restart FFTF) is discussed in Section 4.3 of Volume 1 (e.g., see Section 4.3.1.1.13). Section 4.3.1.1.13 was revised to clarify that, the Hanford waste management infrastructure is analyzed in this PEIS for the management of waste resulting from FFTF restart and operation. This analysis is consistent with policy and DOE Order 435.1, that DOE radioactive waste shall be treated, stored, and in the case of low-level waste, disposed of at the site where the waste is generated, if practical; or at another DOE facility. However, if DOE determines that use of the Hanford waste management infrastructure or other DOE sites is not practical or cost effective, DOE may issue an exemption under DOE Order 435.1 for the use of non-DOE facilities (i.e., commercial facilities) to store, treat, and dispose of such waste generated from the restart and operation of FFTF. In addition, Section 4.3.3.1.13 and 4.4.3.1.13 also address the potential impacts associated with the waste generated from the target fabrication and processing in FMEF and how this waste would be managed at the site.

153-5: See response to comment 153-3.

Commentor No. 153: Thomas Marshall (Cont'd)

Response to Commentor No 153

- 153-6:** On June 9, 2000, the President issued a proclamation establishing the Hanford Reach National Monument. The U.S. Fish and Wildlife Service will manage the monument under existing agreements with DOE and DOE will consult with the Secretary of the Interior on issues potentially affecting monument areas. DOE is committed to performing its missions in a manner that is compatible with the preservation of open space and protection of natural resources. Integrated land use planning is one means that DOE uses to accomplish mission and resource protection goals on its sites. However, these land use planning measures and specific resource protection initiatives and decisions are beyond the scope of this NI PEIS, and designation of the Hanford Reach as a Wild and Scenic River is not within DOE's authority. The Department of the Interior recommended that the Hanford Reach be designated a Wild and Scenic River and the entire Wahluke Slope a wildlife refuge in the ROD for the 1996 Hanford Reach EIS. Congress has not yet acted to implement the decisions contained in the ROD. DOE did prepare the Final Hanford Comprehensive Land-Use Plan Environmental Impact Statement (DOE EIS-0222-F) (issued in September 1999) in order to evaluate the implementation of a comprehensive land-use plan for the entire Hanford Site for the next 50 years. The Preferred Alternative for this EIS, as selected in the Record of Decision (64 FR 61615 et seq.), would designate the majority of the Columbia River Corridor including the Hanford Reach, nearly the entire Wahluke Slope, and nearly all of the Fitzner/Eberhardt Arid Lands Ecology Reserve as preservation use. This would include expansion of the Saddle Mountain National Wildlife Refuge to include all of the Wahluke Slope. In summary, the decisions contained in the ROD are consistent with those in the 1996 Department of the Interior Hanford Reach EIS ROD.

Commentor No. 154: Rob McCready

From: Rob McCready
[SMTP:ROB@SUMMITPROJECTS.COM]
Sent: Tuesday, August 29, 2000 12:00:50 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: Hanford
Auto forwarded by a Rule

To whom it may concern,

I am sure that you are getting your fair share of feedback from the Columbia Gorge community regarding the issues at hand, so I'll keep this short but to the point.

As an advocate for the natural beauty and limited resources of the Columbia River Gorge area, I would like to take a stand against any future development at the Hanford Nuclear Plant. Any future development is not acceptable to the people who care about and recreate in our environment, until proper cleanup and disposal of the current situation is done.

I think I speak on behalf of all Hood River residents when I say that any potential pollutants to our river system will severely destruct the attractiveness of our town and will, without a doubt, affect our economy and quality of life here.

Rob McCready
Marketing
Summit Projects
PH 541_387_8883
FX 541_387_8884
rob@summitprojects.com
www.summitprojects.com

154-1

154-2

Response to Commentor No. 154

154-1: DOE was tasked by Congress in the Atomic Energy Act of 1954, as amended, to "ensure the availability of isotopes for medical, industrial, and research applications, meeting the nuclear material needs of other federal agencies, and undertaking research and development of activities related to development of nuclear power for civilian use." The purpose of this PEIS is to determine the environmental and other impacts to accomplishing this mission from all reasonable existing and new DOE resources. The FFTF at the Hanford Site was one of several existing DOE resources that was assessed for this mission.

DOE notes the commentor's opposition to Alternative 1, Restart FFTF, and concerns regarding the existing cleanup mission at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement. The proposed alternatives delineated in the NI PEIS would not have an impact on Hanford cleanup activities.

The use of Hanford Facilities for the NI PEIS mission would not be a new or future development, but a utilization of existing facilities.

154-2: FFTF is approximately 4.5 miles from the Columbia River. There are no discharges to the river from FFTF and no radioactive or hazardous discharges to groundwater. As indicated in analyses presented in Chapter 4 of Volume 1 (e.g., Sections 4.3.1.1.4, 4.3.3.1.4, 4.4.3.1.4, 4.5.3.2.4, and 4.6.3.2.4), there would be no discernible impacts to groundwater or surface water quality at Hanford from operation of Hanford facilities that would support the nuclear infrastructure missions described in Section 1.2 of Volume 1.

Commentor No. 155: Andreas Juen

From: Andreas[SMTP:ANDREAS@SUMMITPROJECTS.COM]
 Sent: Tuesday, August 29, 2000 2:20:05 PM
 To: INFRASTRUCTURE_PEIS, NUCLEAR
 Subject: FFTF restart MUST BE SHUTDOWN!
 Auto forwarded by a Rule

Colette,

Thank you for hearing me out. I am a community member in Hood River, Oregon, and I feel strongly that USDOE should choose Alternative_5_ SHUTDOWN FFTF, or Alternative_2_ Produce at existing sites with in conjunction with the SHUTDOWN of FFTF.

My message is clear I do not want to see the Nuclear facility at Hanford be reopened with any production capabilities.

HANFORD must remain closed and efforts to clean up the environmental, biological and ecological disaster must continue!

The EIS which has been submitted is misleading, inaccurate and false. Public comment is strongly in opposition to this plan and the need for an FFTF restart is unjustified. Financially it is a disaster and frankly I am tired of my taxes paying for your poor decision making. The money which you will waste on this effort alone would cover a healthy portion of the cleanup which should be taking place currently at the Hanford site.

I know you will heed your conscience at not allow, what is in my view, a criminal decision to restart FFTF.

155-1

155-2

155-3

155-4

155-2

155-5

Response to Commentor No 155

155-1: DOE notes the commentor's support for Alternative 5, Permanently Deactivate FFTF, or Alternative 2, Use Only Existing Operational Facilities, and opposition to Alternative 1, Restart FFTF.

155-2: DOE notes the commentor's concerns regarding ongoing activities to remediate the existing contamination at Hanford. Although beyond the scope of this NI PEIS, ongoing Hanford cleanup activities are high priority to DOE. Hanford Site environmental restoration activities are conducted in accordance with the Tri-Party Agreement (i.e., Washington State Department of Ecology, U.S. Environmental Protection Agency, and the U.S. Department of Energy). This agreement specifies milestones and schedules for restoration of all parts of the Hanford Site. DOE is fully committed to honoring this agreement.

DOE was tasked by Congress in the Atomic Energy Act of 1954, as amended, to "ensure the availability of isotopes for medical, industrial, and research applications, meeting the nuclear material needs of other federal agencies, and undertaking research and development of activities related to development of nuclear power for civilian use." The purpose of this PEIS is to determine the environmental and other impacts to accomplishing this mission from all reasonable existing and new DOE resources. The FFTF at the Hanford Site was one of several existing DOE resources that was assessed for this mission.

The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). The nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted funds designated for Hanford cleanup, regardless of the alternative(s) selected.

155-3: This NI PEIS has been prepared in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and the related CEQ and DOE implementation regulations (40 CFR Parts 1500 through 1508 and 10 CFR Part 1021), respectively. The environmental impacts of reasonable alternatives to fulfill the requirements of the missions were disclosed and evaluated in the NI PEIS. DOE made every effort to obtain, analyze, and disclose all required information to make a decision on

Commentor No. 155: Andreas Juen (Cont'd)

I ask of you to SHUTDOWN FFTF PERMANENTLY. CLEAN UP HANFORD. And START POURING YOU TIME MONEY AND INTELLECTUAL RESOURCES INTO ALTERNATIVE, LOW IMPACT ENERGY SOURCES. There are 1000's out there and many we have not even begun to consider, please encourage your engineers, scientists, explorers and bureaucrat to think outside the box and I am sure they too would start to see the light and make the right decisions for themselves their families as well as the rest of the nation's.

I appreciate you time and effort, and look forward to your action and response.

Sincerely,

Andreas Juen
4035 Stonegate Dr
Hood River, OR 97031

PS: I would like to be added to any sort of mailing list you have established for this issue so I can continue to provide feedback and responses.

=====
Andreas V. Juen
Business Development
andreas@summitprojects.com
101.5 Oak St,
Hood River, OR 97031
P: 541_387_8883
F: 541_387_8884
=====

155-1

155-6

Response to Commentor No. 155

expanding nuclear infrastructure. Further, DOE evaluated each environmental resource area in a consistent, unbiased manner across all the alternatives to allow a fair comparison among the various alternatives.

155-4: DOE notes the commentor's opposition to restarting FFTF for maintaining and enhancing its existing nuclear facility infrastructure. Consistent with its mandates under the Atomic Energy Act, DOE seeks to maintain and enhance its infrastructure for the purposes of addressing three primary needs:

1) to support the need for increased domestic production of isotopes for medical, research, and industrial uses, as initially identified by a panel of experts in the medical field and reaffirmed by the Nuclear Energy Research Advisory Committee;

2) to support future NASA space exploration missions by re-establishing a domestic capability to produce plutonium-238, a fuel source that is required for deep space missions and which the U.S. has no long-term, assured supply; and

3) to support civilian nuclear research and development needs in order to maintain the clean, safe, and reliable use of nuclear power as a viable component of the United States' energy portfolio. Section 1.2 of Volume 1 has been revised to clarify the purpose and need of the proposed action.

155-5: See response to comment 155-1.

155-6: DOE notes the commentor's interest in alternative energy sources, although issues of research and development of alternative energy sources are beyond the scope of this NI PEIS. The DOE missions to be addressed in this EIS, which include the production of medical and industrial isotopes, the production of plutonium-238, and civilian nuclear energy research and development, can currently only be met using nuclear reactor or accelerator technologies.

Commentor No. 156: Gary Greene

From: Gary Greene[SMTP:G5GREENE@EMAIL.MSN.COM]
Sent: Tuesday, August 29, 2000 3:59:18 PM
To: INFRASTRUCTURE_PEIS, NUCLEAR
Subject: Support for the restart of FFTF _ comment on the
draft PEIS
Auto forwarded by a Rule

Of the various options, only the use of FFTF as the
irradiation facility appears to fully meet the commitments
of DOE and provide for the development of medical
isotopes. I think that it is critical that the chosen option
provide adequate opportunity for the development and
production of isotopes for research and cancer
treatment.

Thank you
Gary Greene

1700 S Kellogg
Kennewick, WA 99338

156-1

Response to Commentor No 156

156-1: DOE notes the commentor's support for Alternative 1, Restart FFTF.

Commentor No. 157: Anonymous

NI PEIS Toll_Free Telephone

8/28/00

9010 NE 112th Avenue
Vancouver, WA 98662
360_896_1128

This message is for Bill Richardson. I am a citizen at Vancouver, Washington, and I would just like to ask that the FFTF reactor not be started up again.

Thanks a lot.

157-1

Response to Commentor No. 157

157-1: DOE notes the commentor's opposition to Alternative 1, Restart FFTF.

**Commentor No. 158: Members of Congress; U.S. Senator-
R. Wyden; Representatives-B. Baird, J. McDermott, D. Wu,
A. Smith, E. Blumenauer, P. DeFazio, D. Hooley**

AUG. 28. 2000 6:13PM SEN RON WYDEN

NO. 266 P. 2/5

Congress of the United States

Washington, DC 20510

August 28, 2000

The Honorable Bill Richardson
Secretary of Energy
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Dear Secretary Richardson:

We are growing increasingly concerned with the apparent bias of the Environmental Impact Statement (EIS) for Hanford's FFTF nuclear reactor, and the public participation process for this EIS. The Draft EIS fails to reflect the fact that claimed justifications for restart of this reactor, with all of its risks and costs, have either evaporated with formal decisions from other agencies (NASA) or been called into question by the Department's own blue ribbon advisory committee.

Restart of the FFTF Nuclear Reactor and resumption of Plutonium processing at Hanford would have potentially catastrophic impacts on the health of Northwest citizens and our environment. Our constituents are entitled to a fair and impartial process to consider all reasonably foreseeable impacts and reasonable alternatives.

The Department is preventing our constituents and ourselves from reviewing and commenting on the Department's assessment of many of those potential impacts and alternatives by separating them from the Draft Environmental Impact Statement (EIS) and only disclosing them in reports to be made available after the public hearings are over. Apart from the clear bias of such an approach, this seems to be a violation of the National Environmental Policy Act (NEPA). Major public concerns stated in our comments for the scoping of this EIS, including public concerns detailed in the Seattle City Council and Portland City Commission Resolutions opposing FFTF restart (and formally entered into the record at scoping hearings), are ignored in the Draft EIS.

It is not acceptable to have left out of the Draft EIS what the Department will do with the nuclear and toxic wastes from restarting FFTF and Plutonium operations at Hanford. It is also unacceptable to have left out of the Draft EIS the costs of restarting the FFTF reactor and each alternative (especially when the Department has target budgets that are not adequate to comply with the Hanford Clean-Up Agreement), the impacts on the nation's nuclear non-proliferation policies from restarting the reactor and use of Plutonium or High Enriched Uranium fuels, and the independent assessment of the need for particular medical isotopes and the suitability of the FFTF reactor to produce them. For each of these four critical areas, the Department has chosen to issue a report separate from the Draft EIS and not to release that report before the public hearings on the Draft EIS.

Response to Commentor No. 158

- 158-1:** DOE notes the commentors' concerns. This NI PEIS has been prepared in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and the related CEQ and DOE implementation regulations (40 CFR Parts 1500 through 1508 and 10 CFR Part 1021), respectively. DOE evaluated each environmental resource area in a consistent, unbiased manner across all the alternatives to allow a fair comparison among the various alternatives.
- 158-2:** DOE policy encourages effective public participation in its decisionmaking process. In compliance with NEPA and CEQ regulations, DOE provided opportunity to the public to comment on the scope of the NI PEIS and the environmental impact analysis of DOE's proposed alternatives. DOE gave equal consideration to all comments. In preparing the Final NI PEIS, DOE carefully considered comments received from the public.
- 158-3:** The content of recent correspondence between NASA and DOE regarding potential plutonium-238 requirements is discussed in response to Comment 158-15.
- 158-4:** DOE notes the commentors' concern regarding the suitability of FFTF in light of the NERAC subcommittee recommendations, as discussed in the response to Comment 158-13.
- 158-5:** The evaluation presented in the NI PEIS considered both normal operations and accidents and indicates that the environmental and human health impacts of these facilities would be low.
- 158-6:** See responses to Comments 158-1 and 158-2.
- 158-7:** The environmental impacts of reasonable alternatives to fulfill the requirements of the missions were disclosed and evaluated in the NI PEIS. DOE made every effort to obtain, analyze, and disclose all required information to make a decision on expanding nuclear infrastructure. The costs and nuclear nonproliferation impacts of proposed actions are not required by NEPA and CEQ regulations to be included in a PEIS. DOE prepared a separate Cost Report and Nuclear Infrastructure Nonproliferation Impact Assessment to provide additional pertinent information to the Secretary of Energy so that he may make an informed decision with respect to the alternatives presented in the NI PEIS. Pursuant to CEQ regulations (40 CFR 1505.1(e)), agencies are encouraged to make decision documents such as the cost report available

**Commentor No. 158: Members of Congress; U.S. Senator-
R. Wyden; Representatives-B. Baird, J. McDermott, D. Wu,
A. Smith, E. Blumenauer, P. DeFazio, D. Hooley (Cont'd)**

AUG. 28. 2000 6:14PM SEN RON WYDEN

NO. 265 P. 3/5

We are dismayed that the Draft EIS fails to disclose that the Department's own blue ribbon medical advisory committee recommended last April that *"the FFTF not be considered as a viable long-term source of research radioisotopes."* The NERAC Subcommittee for Isotope Research and Production Planning's findings regarding the suitability of the FFTF reactor for production of research medical isotopes¹, the claims of the contractors regarding FFTF's costs and projected revenues for producing isotopes, and "poor" rating of the manufacturing practices at Hanford are neither disclosed or referenced in the Draft EIS.

"The Subcommittee concludes that the FFTF will not be a viable source of research radioisotopes. Anticipated income from sales likely will not meet expectations thereby curtailing operations and reducing FFTF's capability to produce research radioisotopes in a timely and cost-efficient manner. ...

"The Subcommittee believes that the production needs of neutron-rich isotopes for research purposes can be met by existing reactors... Other neutron sources may also be available for research isotope production."
Final Report at 31.

The Draft EIS should have considered the alternatives recommended by the Subcommittee, and fully disclosed its criticism of the claims made by the FFTF's contractors. Instead, the Draft EIS and DOE documents repeat the cost and isotope need claims that the Subcommittee found to be flawed and overly optimistic. The public deserved to have this fully disclosed in the Draft EIS instead of having it discovered by researchers from citizen groups.

The concerns of the City of Seattle (Resolution 30060 and Resolution 28848) regarding the import of Plutonium on board ships passing through inland waters (such as Puget Sound or the Columbia River to the Port of Portland), and transport of Plutonium through the crowded Puget Sound region, are entirely ignored in this EIS. A shipboard fire involving a shipment of Weapons Grade Plutonium fuel in inland waters poses horrific consequences. Exposure of our constituents to such risk is entirely unacceptable. Other major concerns raised in the Portland and Seattle resolutions, and by Members of Congress, are similarly ignored in the Draft EIS. The Department undermines all public confidence in its consideration of the restart of FFTF when it proposes such actions and ignores the formal input from elected officials and the region's major cities.

¹ The report notes that there are two major types of medical isotopes: large scale production quantities ("commercial" isotopes) and small quantity demand isotopes for clinical trials, research, etc... ("research" isotopes). The report urges that the Department focus on providing the research isotopes, and allowing market forces to provide commercial isotopes. Most of the claims for need for FFTF are based on research isotopes. The size of the reactor and its cost to restart, provide ancillary facilities and operate were negative factors in the committee's opinion.

Response to Commentor No. 158

to the public before a decision is made. DOE mailed these documents to approximately interested parties on August 24 and September 8, 2000, respectively. Both reports were made available immediately upon release on the NE web site (<http://www.nuclear.gov>) and in the public reading rooms. DOE has also provided summaries of the Cost Report and Nuclear Infrastructure Nonproliferation Impact assessment in Appendixes P and Q, respectively, in the Final NI PEIS.

- 158-8: DOE has read and considered the public concerns detailed in the Resolutions of the Seattle City Council and the Portland City Commission. Section 1.4 and the expanded discussion in Appendix N summarize the issues and concerns raised during the scoping process.
- 158-9: Management of wastes that would be generated under implementation of Alternative 1 (Restart FFTF) is discussed in Section 4.3 of Volume 1 (e.g., see Section 4.3.1.1.13). Section 4.3.1.1.13 was revised to clarify that, the Hanford waste management infrastructure is analyzed in this PEIS for the management of waste resulting from FFTF restart and operation. This analysis is consistent with policy and DOE Order 435.1, that DOE radioactive waste shall be treated, stored, and in the case of low-level waste, disposed of at the site where the waste is generated, if practical; or at another DOE facility. However, if DOE determines that use of the Hanford waste management infrastructure or other DOE sites is not practical or cost effective, DOE may issue an exemption under DOE Order 435.1 for the use of non-DOE facilities (i.e., commercial facilities) to store, treat, and dispose of such waste generated from the restart and operation of FFTF. In addition, Section 4.3.3.1.13 and 4.4.3.1.13 also address the potential impacts associated with the waste generated from the target fabrication and processing in FMEF and how this waste would be managed at the site.
- 158-10: The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). Nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted fund designated for Hanford cleanup, regardless of the alternative(s) selected.

Commentor No. 158: Members of Congress; U.S. Senator-R. Wyden; Representatives-B. Baird, J. McDermott, D. Wu, A. Smith, E. Blumenauer, P. DeFazio, D. Hooley (Cont'd)

AUG. 28, 2000 6:14PM SEN RON WYDEN

NO. 266 P. 4/5

Although the major mission proposed for the FFTF reactor in this EIS is production of Plutonium 238 for NASA space reactors (Radioisotope Thermoelectric Generators), the Draft EIS fails to disclose that NASA informed the USDOE on May 22, 2000 that:

"NASA headquarters no longer has an identifiable planned requirement for Small Radioisotope Thermoelectric Generator (STRG) power systems."

Contrary to the DOE's assertion in the Draft EIS that "(W)ithout these power systems, these types of space exploration missions could not be performed by NASA,"² NASA has determined that missions can utilize alternative technologies with lower costs and potentially much lower environmental impacts, which this Draft EIS should have disclosed.

The major claimed need for FFTF restart no longer exists, yet the Department continues to expend funds and undermine its credibility by continuing to propose the restart of the FFTF reactor to meet a need for Plutonium that NASA has informed you does not exist.

As the hearings on the Draft EIS approach, the Department is not providing for adequate notice of the hearings to our constituents. It also has not changed its plans for conduct of the hearings, which seem designed to repeat concerns over the bias of the process. And, the officials in charge of the EIS failed to live up to expectations for meaningful discussions regarding the substance of the EIS regarding its coverage of major areas of concern, including the need for medical isotopes, alternative market providers of medical isotopes, safety issues, waste streams from proposed activities, nonproliferation impacts and costs of FFTF restart and production.

We are also disturbed that the Department told facilities at which hearings are to be held that public interest groups are "opposition" and "protest" groups, and required them to pay for police in order to hold pre-hearing workshops. We must note that the Cities of Seattle and Portland are officially opposed to the restart of FFTF and, therefore, apparently, "opposition" groups that the Department feels pose a security threat if they seek to hold a pre-hearing workshop to assist citizens in preparing to comment at the hearing.

We urge you to have the Department immediately take the following steps to: provide proper notice (designed to notify our constituents that these hearings are on an EIS regarding the possible restart of Hanford's FFTF Nuclear Reactor and Plutonium processing); establish unbiased procedures for the conduct of the hearings; apologize for any characterization of groups as "opposition" or "protest"; and ensure that there is no intimidation of public comment.

The claimed Plutonium and isotope needs, for which our region would be subjected to the risks of FFTF nuclear reactor restart, are now revealed to be illusory claims by the proponents of this dangerous project. The Draft EIS is deeply flawed by its failure to disclose information that is essential to informed decision making. Therefore, the most prudent course of action would be to remove restart of the FFTF reactor from consideration until these concerns are addressed.

² DEIS at 3-5

Response to Commentor No 158

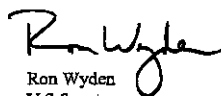
- 158-11:** DOE notes the commentors' concern that an independent assessment of the need for particular isotopes and the suitability of FFTF is not included in the NI PEIS. Section 1.2.1 of Volume 1 discusses the need for isotopes based on the Expert Panel and NERAC subcommittee recommendations. As further discussed in the response to Comment 158-13 and presented in Section 1.5 of Volume 1, the recommendations of these independent review groups were taken into consideration in developing the range of reasonable alternatives evaluated in the NI PEIS. The Expert Panel and NERAC are independent Federal advisory committees appointed by the Secretary of Energy to advise DOE on civilian nuclear energy research program as noted in Section 1.2 of Volume 1.
- 158-12:** The draft Waste Minimization and Management Plan for the Fast Flux Test Facility (May 2000) and the NERAC Isotope Subcommittee report (April 2000) were referenced in the NI PEIS and were available prior to the public hearings. The NI PEIS cost and Nonproliferation reports were made available on August 24 and September 8, 2000, respectively; immediately after they were completed, as discussed in response to Comment 158-7.
- 158-13:** DOE has sought independent analysis of trends in the use of medical isotopes, and of its continuing role in this sector, consistent with its mandates under the Atomic Energy Act. In doing so, it established two expert bodies, the Expert Panel and the NERAC. In 1998, the Expert Panel convened to forecast future demand for medical isotopes estimated that the expected growth rate of medical isotope use during the next 20 years will range from 7 to 14 percent per year for therapeutic applications, and 7 to 16 percent per year for diagnostic applications. These findings were later reviewed and endorsed by NERAC, established in 1999 to provide DOE with expert, objective advice regarding the future form of its isotope research and production activities. DOE has adopted these growth projections as a planning tool for evaluating the potential capability of the existing nuclear facility infrastructure to meet programmatic requirements. In the period since the initial estimates were made, the actual growth of medical isotope use has tracked at levels consistent with the Expert Panel findings. Section 1.2.1 of Volume 1 was revised to incorporate this information and to clarify DOE's role in fulfilling the U.S. research and commercial isotope production needs.

**Commentor No. 158: Members of Congress; U.S. Senator-
R. Wyden; Representatives-B. Baird, J. McDermott, D. Wu,
A. Smith, E. Blumenauer, P. DeFazio, D. Hooley (Cont'd)**

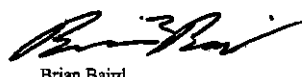
AUG. 28, 2000 6:15PM SEN RON WYDEN

NO. 266 P.5/5

Sincerely,



Ron Wyden
U.S. Senator

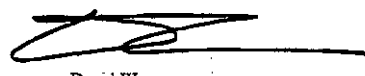

Adam Smith
U.S. Representative

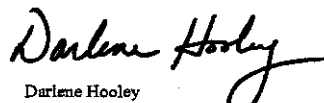

Brian Baird
U.S. Representative


Earl Blumenauer
U.S. Representative


Jim McDermott
U.S. Representative


Peter A. DeFazio
U.S. Representative


David Wu
U.S. Representative


Darlene Hooley
U.S. Representative

Response to Commentor No. 158

The conclusions presented in the NERAC Subcommittee for Isotope Research and Production Planning Final Report, April 2000 regarding the suitability of FFTF to produce research isotopes in a timely and cost-efficient manner were made in the context of the facility producing research isotopes as its sole mission. It would not be cost effective to restart FFTF for the singular purpose of producing small quantities of various research isotopes. However, sustained operation of FFTF for the production of larger quantities of both research and commercial isotopes would be viable if operated in concert with producing plutonium-238 and conducting nuclear energy research and development for civilian applications. As the NERAC report states: "In limited instances, the DOE possesses unique resources, e.g., the high flux of fast neutrons and large irradiation volume in FFTF, that could be utilized for the production of some radioisotopes, but is best suited for commercial interests who might consider its use for isotope production." In recognition of these constraints on its operational feasibility, the NI PEIS only evaluates the use of FFTF when coupled with the other missions. While some existing reactors may possess the potential capability or capacity to support research isotope production, as suggested in the NERAC report, it is unlikely that reliable, increased production of these isotopes to support projected needs could be accomplished without disturbing the existing missions of these facilities. DOE has taken the Expert Panel and NERAC report recommendations under consideration in developing the range of alternatives evaluated in the NI PEIS. These reports were made available to the public at the NI PEIS public information centers and on the Internet at www.nuclear.gov.

- 158-14:** DOE notes the Commentors' concerns about the import of plutonium through the Portland or Seattle areas. None of the proposed alternatives (Section 2.5 of Volume 1) would involve the shipment of weapons-grade plutonium through ports in the United States. Under implementation of Alternative 1 (Restart FFTF), DOE might import mixed oxide (i.e., plutonium-uranium) fuel from Europe. If Alternative 1 were selected for implementation, and if DOE decides to import mixed oxide fuel from Europe, a separate NEPA review would be conducted to select a port to receive the mixed oxide fuel. This review would address all relevant potential impacts of overseas and inland water transportation, shipboard fires, package handling, land transportation, as well as safeguards and security associated with the import of SNR-300 mixed oxide fuel through a variety of specific candidate ports on the west and

Commentor No. 158: Members of Congress; U.S. Senator-R. Wyden; Representatives-B. Baird, J. McDermott, D. Wu, A. Smith, E. Blumenauer, P. DeFazio, D. Hooley (Cont'd)

Response to Commentor No 158

east coasts. It would consider all public comments, including local resolutions, concerning the desirability of bringing mixed oxide fuel into candidate ports.

In the event that DOE decides to enhance its nuclear infrastructure, it would not expose any population to high, unacceptable risks under any alternative. Any transportation activities that would be conducted by DOE would comply with U.S. Nuclear Regulatory Commission and U.S. Department of Transportation regulations. Associated transatlantic shipment would comply with International Atomic Energy Agency requirements. In Section J.6.2, DOE evaluated potential impacts that would result from the marine transportation of mixed oxide fuel from Europe to a representative military port, Charleston, South Carolina, and overland transportation to Hanford. Also in that section, a bounding analysis demonstrates that radiological risks to the surrounding public from mixed oxide fuel shipments would be extremely small (e.g., less than 1 chance in a trillion for a latent cancer fatality per shipment from severe accidents at docks and in channels and less than 1 chance in 50 billion for a latent cancer fatality per shipment from overland highway accidents).

- 158-15:** Through a Memorandum of Understanding with NASA, DOE provides radioisotope power systems, and the plutonium-238 that fuels them, for space missions that require or would be enhanced by their use. In addition, under the National Space Policy issued by the Office of Science and Technology Policy in September 1996, and consistent with DOE's charter under the Atomic Energy Act, DOE is responsible for maintaining the capability to provide the plutonium-238 needed to support these missions. There are approximately 9 kilograms (19.8 pounds) of plutonium-238 in the U.S. inventory available to support future NASA space missions. Based on NASA guidance to DOE on the potential use of radioisotope power systems for upcoming space missions, it is anticipated that the existing plutonium-238 inventory will be exhausted by approximately 2005. Under the No Action Alternative, DOE would continue to purchase plutonium-238 to meet the space mission needs for the 35-year evaluation period considered in the NI PEIS. However, DOE recognizes that any purchase beyond what is currently available to the United States through the existing contract would likely require negotiation of a new contract and may require additional NEPA review.

The May 22, 2000, correspondence from NASA to DOE identifies that NASA no longer has a planned requirement for small radioisotope

Commentor No. 158: Members of Congress; U.S. Senator-R. Wyden; Representatives-B. Baird, J. McDermott, D. Wu, A. Smith, E. Blumenauer, P. DeFazio, D. Hooley (Cont'd)

Response to Commentor No 158

thermoelectric generator (SRTG) power systems. This does not mean that NASA no longer requires DOE to provide the necessary plutonium-238 to support deep space missions. Rather, the SRTG development efforts were stopped in order to permit reprogramming of funds to support development of a new radioisotope power system based on a Stirling technology generator. This new radioisotope power system, referred to in the subject correspondence, requires one-third less plutonium-238 as its fuel source. However, the Stirling technology is developmental and NASA has requested in a September 22, 2000, letter to DOE that large RTGs be maintained as backup. Section 1.2.2 of Volume 1 was revised to clarify plutonium-238 mission needs. The major mission of FFTF would not be the production of plutonium-238. Rather, all three missions are of equal importance; no one mission is given priority in the NI PEIS.

- 158-16:** DOE provided notice of scheduled public hearings in accordance with the requirements of CEQ and DOE regulations (i.e., 40 CFR Parts 1503.1 and 1506.6 and 10 CFR Part 1021.313, respectively). This included announcement of the hearings in the Federal Register as well as in the local media. In addition, copies of the Draft NI PEIS and/or the Summary (including the public hearing schedule) were sent to each individual or group listed to receive it at the address on record. Additional notification to the public concerning meetings on the Draft PEIS were made by the Oregon Office of Energy to members of 20 focus groups in six Oregon communities and other Oregon interest groups.
- 158-17:** The public hearing format was designed to be fair and unbiased. The public hearing format used was based on stakeholder input and was presented in the Notice of Availability (65 FR 46443 et seq.) for the Draft NI PEIS. This format was intended to encourage public participation, regardless of the motivation for attending the hearing. It provided an opportunity for the participants to meet one another, exchange information, and share concerns with DOE personnel available throughout the course of each hearing to answer questions. The meetings were facilitated by an independent moderator to ensure that all persons wishing to speak had an opportunity to do so. Persons wishing to comment were selected at random from the audiences rather than according to the order in which they registered. This was accomplished by a random number drawing. In addition to the comment recorder stationed at the main hearing, a second recorder was available in an adjacent room to receive comments without the need to

***Commentor No. 158: Members of Congress; U.S. Senator-
R. Wyden; Representatives-B. Baird, J. McDermott, D. Wu,
A. Smith, E. Blumenauer, P. DeFazio, D. Hooley (Cont'd)***

Response to Commentor No. 158

await selection at the main proceeding. The hearing format used promoted open and equal representation by all individuals and groups.

- 158-18:** The need for medical isotopes and alternate suppliers are discussed in Section 1.2.1 of Volume 1. Safety and health issues are discussed throughout Chapter 4 of Volume 1 with details given in Appendixes H through J of Volume 2. Waste generation and waste management for each of the alternatives are discussed throughout Chapter 4 of Volume 1. As discussed in the response to Comment Number 158-7, the cost report and nonproliferation report were made available to the public on August 24, 2000 and September 8, 2000, respectively.
- 158-19:** DOE does not engage in or condone the actions alleged in the comment. DOE did not and does not label organizations or individuals. Neither does it interfere with workshops held by an organization, nor exert any influence or authority in the matter of fees for security and law enforcement charged by the owners or managers of facilities in which public meetings are held. Such matters are determined by the rules and regulations adopted by or applied to these facilities, consistent with local laws and municipal requirements. For the record, DOE did not characterize public hearings participants as “opposition” or “protest” groups, and further, did not attempt to recommend or influence any meeting facility fees or security measures applicable to any group or individual.
- 158-20:** The commentors’ concern for proper notice of the public hearing process is addressed in response to Comment 158-16.
- 158-21:** The commentors’ request to establish procedures for unbiased hearings is addressed in response to Comment 158-17.
- 158-22:** The issue of opposition groups is addressed in response to Comment 158-19.
- 158-23:** DOE notes the commentors’ views.

**Commentor No. 159: Vera Katz, Mayor, City of Portland
(C. Hales, J. Francesconi, D. Saltzman, E. Sten)**



City of Portland
Vera Katz
Mayor

Honorable Bill Richardson,
Secretary of Energy
U.S. Department of Energy
1000 Independence Ave. SW
Washington, D.C. 20585

August 22, 2000

Dear Secretary Richardson:

We support your initiatives for discussions and use of independently facilitated, principled negotiations regarding the future of Hanford's FFTF Nuclear Reactor, which you put forward at the Washington State Democratic Convention on June 10th in a meeting with Washington Democrats. These commitments were innovative efforts at ensuring meaningful dialogue on an issue that has created deep opposition and undermined public confidence in Department commitments. We congratulate you for your willingness to make commitments to improve the EIS and engage in principled negotiations. We are growing increasingly concerned, however, with the apparent bias of the EIS, and the public participation process for the EIS. The Draft EIS appears to cover-up the fact that claimed justifications for restart of this reactor, with all of its risks and costs, have either evaporated with formal decisions from other agencies (NASA) or been called into question by the Department's own blue ribbon advisory committee.

Restart of the FFTF Nuclear Reactor and resumption of Plutonium processing at Hanford would have potentially catastrophic impacts on the health of Northwest citizens and our environment. Our constituents are entitled to a fair and impartial process to consider all reasonably foreseeable impacts and reasonable alternatives.

The Department is preventing our constituents and our selves from reviewing and commenting on the Department's assessment of many of those potential impacts and alternatives by separating them from the Draft Environmental Impact Statement (EIS) and only disclosing them in reports to be made available after the public hearings are over. Apart from the clear bias of such an approach, this seems to be a clear violation of the National Environmental Policy Act (NEPA). Major public concerns stated in our comments for the scoping of this EIS, including public concerns detailed in the Seattle City Council and Portland City Commission Resolutions opposing FFTF restart (and formally entered into the record at scoping hearings) are ignored in the Draft EIS.

It is not acceptable to have left out of the Draft EIS what the Department will do with the nuclear and toxic wastes from restarting FFTF and Plutonium operations at Hanford. It is also unacceptable to have left out of the Draft EIS the costs of restarting the FFTF reactor and each alternative (especially when the Department has target budgets that are not adequate to comply with the Hanford Clean-Up Agreement), the impacts on the nation's nuclear non-proliferation policies from restarting the reactor and use of Plutonium or High Enriched Uranium fuels, and the independent assessment of the need for particular medical isotopes and the suitability of the FFTF reactor to produce them.

For each of these four critical areas, the Department has chosen to issue a report separate from the Draft EIS and not to release that report before the public hearings on the Draft EIS. We must assume that these reports are not flattering to the Department's claims for the FFTF Nuclear Reactor, and that this is a deliberate strategy to avoid disclosure and public comment.

Response to Commentor No 159

- 159-1:** DOE notes the commentors' concerns. This NI PEIS has been prepared in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and the related CEQ and DOE implementation regulations (40 CFR Parts 1500 through 1508 and 10 CFR Part 1021), respectively. DOE evaluated each environmental resource area in a consistent, unbiased manner across all the alternatives to allow a fair comparison among the various alternatives.
- 159-2:** DOE policy encourages effective public participation in its decision making process. In compliance with NEPA and CEQ regulations, DOE provided opportunity to the public to comment on the scope of the NI PEIS and the environmental impact analysis of DOE's proposed alternatives. DOE gave equal consideration to all comments. In preparing the Final NI PEIS, DOE carefully considered comments received from the public.
- 159-3:** The content of recent correspondence between NASA and DOE regarding potential plutonium-238 requirements is discussed in response to Comment 159-15.
- 159-4:** DOE notes the commentors' concern regarding the suitability of FFTF in light of the NERAC subcommittee recommendations, as discussed in the response to Comment 159-13.
- 159-5:** The evaluation presented in the NI PEIS considered both normal operations and accidents and indicates that the environmental and human health impacts of these facilities would be low.
- 159-6:** See responses to Comments 159-1 and 159-2.
- 159-7:** The environmental impacts of reasonable alternatives to fulfill the requirements of the missions were disclosed and evaluated in the NI PEIS. DOE made every effort to obtain, analyze, and disclose all required information to make a decision on expanding nuclear infrastructure. The costs and nuclear nonproliferation impacts of proposed actions are not required by NEPA and CEQ regulations to be included in a PEIS. DOE prepared a separate Cost Report and Nuclear Infrastructure Nonproliferation Impact Assessment to provide additional pertinent information to the Secretary of Energy so that he may make an informed decision with respect to the alternatives presented in the NI PEIS. Pursuant to CEQ regulations (40 CFR 15051(e)), agencies are encouraged to make ancillary decision documents available to the public before a decision is made. DOE mailed these documents to approximately 730

Commentor No. 159: Vera Katz, Mayor, City of Portland (Cont'd) (C. Hales, J. Francesconi, D. Saltzman E. Sten)

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TO: 2263321143

PAGE: 02

We are dismayed that the Draft EIS fails to disclose that the Department's own blue ribbon medical advisory committee recommended last April that *"the FFTF not be considered as a viable long-term source of research radioisotopes."* The NERAC Subcommittee for Isotope Research and Production Plannings' findings regarding the suitability of the FFTF reactor for production of research medical isotopes¹, the claims of the contractors regarding FFTF's costs and projected revenues for producing isotopes, and "poor" rating of the manufacturing practices at Hanford are neither disclosed or referenced in the Draft EIS.

"The Subcommittee concludes that the FFTF will not be a viable source of research radioisotopes. Anticipated income from sales likely will not meet expectations thereby curtailing operations and reducing FFTF's capability to produce research radioisotopes in a timely and cost-efficient manner. ...

"The Subcommittee believes that the production needs of neutron-rich isotopes for research purposes can be met by existing reactors... Other neutron sources may also be available for research isotope production."
Final Report at 31.

The Draft EIS should have considered the alternatives recommended by the Subcommittee, and fully disclosed its criticism of the claims made by the FFTF's contractors. Instead, the Draft EIS and DOE documents repeat the cost and isotope need claims that the Subcommittee found to be flawed and over optimistic. The public deserved to have this fully disclosed in the Draft EIS instead of having it discovered by researchers from citizen groups.

The concerns of the City of Seattle (Resolution 30060 and Resolution 28348) regarding the import of Plutonium on board ships passing through inland waters (such as Puget Sound or the Columbia River to the Port of Portland), and transport of Plutonium through the crowded Puget Sound region, are entirely ignored in this EIS. A shipboard fire involving a shipment of Weapons Grade Plutonium fuel in inland waters poses horrific consequences. Exposure of our constituents to such risk is entirely unacceptable. Other major concerns raised in the Portland and Seattle resolutions, and by Members of Congress, are similarly ignored in the Draft EIS. The Department undermines all public confidence in its consideration of the restart of FFTF when it proposes such actions and ignores the formal input from elected officials and the region's major cities.

Although the major mission proposed for the FFTF reactor in this EIS is production of Plutonium 238 for NASA space reactors (Radioisotope Thermoelectric Generators), the Draft EIS fails to disclose that NASA informed the USDQ on May 22, 2000 that:

"NASA headquarters no longer has an identifiable planned requirement for Small Radioisotope Thermoelectric Generator (STRG) power systems."

Contrary to the DOE's assertion in the Draft EIS that "(w)ithout these power systems, these types of space exploration missions could not be performed by NASA,"² NASA has determined that missions can utilize alternative technologies with lower costs. (And, of course, potentially much lower environmental impacts, which this Draft EIS should have disclosed).

The major claimed need for FFTF restart no longer exists, yet the Department continues to expend funds and undermine its credibility by continuing to propose the restart of the FFTF reactor to meet a need for Plutonium that NASA has informed you does not exist.

As the hearings on the Draft Environmental Impact Statement (EIS) approach, the Department is not providing for adequate notice of the hearings to our constituents; has not changed its plans for conduct

¹ The report notes that there are two major types of medical isotopes: large-scale production quantities ("commercial" isotopes) and small quantity demand isotopes for clinical trials, research, etc... ("research" isotopes). The report urges that the Department focus on providing the research isotopes, and allowing market forces to provide commercial isotopes. Most of the claims for need for FFTF are based on research isotopes. The size of the reactor and its cost to restart, provide ancillary facilities and operate were negative factors in the committees' opinion.

² DEIS at S-5

Response to Commentor No. 159

interested parties on August 24 and September 8, 2000, respectively. Both reports were made available immediately upon release on the NE web site (<http://www.nuclear.gov>) and in the public reading rooms. DOE has also provided summaries of the Cost Report and Nuclear Infrastructure Nonproliferation Impact Assessment in Appendixes P and Q, respectively, in the Final NI PEIS.

159-8: DOE has read and considered the public concerns detailed in the Resolutions of the Seattle City Council and the Portland City Commission. Section 1.4 and the expanded discussion in Appendix N summarize the issues and concerns raised during the scoping process.

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159-10: The U.S. Congress funds the Hanford cleanup through the Office of the Assistant Secretary for Environmental Management (EM), and the FFTF through the Office of Nuclear Energy, Science and Technology (NE). Nuclear infrastructure missions described in Section 1.2 of Volume 1 would also be funded by NE, which has no funding connection to Hanford cleanup activities. As stated in Section N.3.2, implementation of the nuclear infrastructure alternatives would not divert or reprogram budgeted fund designated for Hanford cleanup, regardless of the alternative(s) selected.

159-13

159-14

159-15

159-16

**Commentor No. 159: Vera Katz, Mayor, City of Portland
(Cont'd) (C. Hales, J. Francesconi, D. Saltzman E. Sten)**

PAGE:01

of the hearings, which seem designed to repeat concerns over the bias of the process; and, the bureaucracy in charge of the EIS failed to live up to expectations for meaningful discussions regarding the substance of the EIS regarding its coverage of major areas of concern, including the need for medical isotopes, alternative market providers of medical isotopes, safety issues, waste streams from proposed activities, nonproliferation impacts and costs of FFTF restart and production.

The notice for these hearings is woefully inadequate. The published newspaper ad is an example of how to waste funding to claim money was spent on an ad, while seeking to avoid publication of a notice that the public might take notice of. Of primary interest to the citizens of the Northwest is the proposed restart of the FFTF Nuclear Reactor and resumption of Plutonium and other processing operations at Hanford. The notice provided by the Department seems designed to ensure that our constituents would not have notice that this is the topic of the EIS and proposal. Nor did the Department agree to send a meaningful notice to our constituents who are on the normal Hanford issues notice list.

Last year, the conduct of the hearings was itself a major controversy because the Department refused to use a sign in list for determining the order of speakers. Again, the Department appears intent to allow the process to appear biased by allowing the Department's moderator to hand choose the order of speakers. Last year, this resulted in the spokespeople for the region's major public interest groups not being called on to speak until late in the night at hearing after hearing.

We are also disturbed that the Department told facilities at which hearings are to be held that public interest groups are "opposition" and "protest" groups, and required them to pay for police in order to hold pre-hearing workshops. We must note that the Cities of Seattle and Portland are officially opposed to the restart of FFTF and, therefore, apparently, "opposition" groups that the Department feels pose a security threat if they seek to hold a pre-hearing workshop to assist citizens in preparing to comment at the hearing.

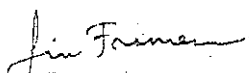
We urge you to have the Department take immediate steps to provide proper notice (designed to notify our constituents that these hearings are on an EIS regarding the possible restart of Hanford's FFTF Nuclear Reactor and Plutonium processing), unbiased procedures for the conduct of the hearings; apologize for any characterization of groups as "opposition" or "protest" and ensure that there is no intimidation of public comment.

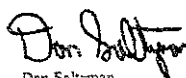
The claimed Plutonium and isotope needs, for which our region would be subjected to the risks of FFTF nuclear reactor restart, are now revealed to be illusory claims by the proponents of this dangerous project. The Draft EIS is so deeply flawed by its failure to disclose, and willful withholding of, information that is essential to informed decision making that the bias can only be overcome by removing the restart of the FFTF reactor from consideration.

Sincerely,


Vera Katz
Mayor


Charlie Hales
Commissioner


Jim Francesconi


Dan Saltzman


E. Sten

Response to Commentor No. 159

The costs and nuclear nonproliferation impacts of proposed actions are not required by NEPA and CEQ regulations to be included in a PEIS. DOE prepared a separate Cost Report and Nuclear Nonproliferation Impact Assessment to provide additional pertinent information to the Secretary of Energy so that he may make an informed decision with respect to the alternatives presented in the NI PEIS. Such ancillary documents need only be made available to the public prior to any decision being made under CEQ regulations (40 CFR Part 1505.1(e)). Nevertheless, DOE mailed these documents to more than 730 interested parties on August 24, 2000 and September 8, 2000, respectively. The reports were made available immediately upon release on the NE web site (<http://www.nuclear.gov>) and in the public reading rooms. DOE has also provided the summary of the Cost Report and Nuclear Nonproliferation Impact Assessment in Appendixes P and Q in the Final NI PEIS.

- 159-11: DOE notes the commentors' concern that an independent assessment of the need for particular isotopes and the suitability of FFTF is not included in the NI PEIS. Section 1.2.1 of Volume 1 discusses the need for isotopes based on the Expert Panel and NERAC subcommittee recommendations. As further discussed in the response to Comment 159-13 and presented in Section 1.5 of Volume 1, the recommendations of these independent review groups were taken into consideration in developing the range of reasonable alternatives evaluated in the NI PEIS. NERAC is an independent Federal advisory committee appointed by the Secretary of Energy to advise DOE on civilian nuclear energy research program as noted in Section 1.2 of Volume 1.
- 159-12: The draft Waste Minimization and Management Plan for the Fast Flux Test Facility (May 2000) and the NERAC Isotope Subcommittee report (April 2000) were referenced in the NI PEIS and were available prior to the public hearings. The NI PEIS cost and Nonproliferation reports were made available on August 24 and September 8, 2000, respectively; immediately after they were completed, as discussed in response to Comment 158-7.
- 159-13: DOE has sought independent analysis of trends in the use of medical isotopes, and of its continuing role in this sector, consistent with its mandates under the Atomic Energy Act. In doing so, it established two expert bodies, the Expert Panel and the NERAC. In 1998, the Expert Panel convened to forecast future demand for medical isotopes

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estimated that the expected growth rate of medical isotope use during the next 20 years will range from 7 to 14 percent per year for therapeutic applications, and 7 to 16 percent per year for diagnostic applications. These findings were later reviewed and endorsed by NERAC, established in 1999 to provide DOE with expert, objective advice regarding the future form of its isotope research and production activities. DOE has adopted these growth projections as a planning tool for evaluating the potential capability of the existing nuclear facility infrastructure to meet programmatic requirements. In the period since the initial estimates were made, the actual growth of medical isotope use has tracked at levels consistent with the Expert Panel findings. Section 1.2.1 of Volume 1 was revised to incorporate this information and to clarify DOE's role in fulfilling the U.S. research and commercial isotope production needs.

The conclusions presented in the NERAC Subcommittee for Isotope Research and Production Planning Final Report, April 2000 regarding the suitability of FFTF to produce research isotopes in a timely and cost-efficient manner were made in the context of the facility producing research isotopes as its sole mission. It would not be cost effective to restart FFTF for the singular purpose of producing small quantities of various research isotopes. However, sustained operation of FFTF for the production of larger quantities of both research and commercial isotopes would be viable if operated in concert with producing plutonium-238 and conducting nuclear energy research and development for civilian applications. As the NERAC report states: "In limited instances, the DOE possesses unique resources, e.g., the high flux of fast neutrons and large irradiation volume in FFTF, that could be utilized for the production of some radioisotopes, but is best suited for commercial interests who might consider its use for isotope production". In recognition of these constraints on its operational feasibility, the NI PEIS only evaluates the use of FFTF when coupled with the other missions. While some existing reactors may possess the potential capability or capacity to support research isotope production, as suggested in the NERAC report, it is unlikely that reliable, increased production of these isotopes to support projected needs could be accomplished without disturbing the existing missions of these facilities. DOE has taken the Expert Panel and NERAC report recommendations under consideration in developing the range of alternatives evaluated in

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the NI PEIS. These reports were made available to the public at the NI PEIS public information centers and on the Internet at <http://www.nuclear.gov>.

- 159-14:** The commentors appear to express the concern that DOE would expose constituents in the Seattle area to risks associated with the transport of weapons-grade plutonium. None of the proposed alternatives would involve the shipment of any weapons-grade plutonium to any port in the United States. Alternative 1 does postulate that DOE might decide at some point to import mixed oxide fuel from Europe to fuel FFTF. At this time, however, DOE has not proposed to import this fuel through any specific port. If DOE ultimately decides to import fuel from Europe, it would perform a separate NEPA analysis to select a port. This review would address all relevant potential impacts of overseas and inland water transportation, shipboard fires, package handling, land transportation, as well as safeguards and security associated with the import of SNR-300 mixed oxide fuel through a variety of specific candidate ports on the west and east coasts. It would consider all public comments, including local resolutions, concerning the desirability of bringing mixed oxide fuel into the proposed alternative ports.

In the event that DOE decides to enhance its nuclear infrastructure, it would not expose any population to high, unacceptable risks under any alternative. Any transportation activities that would be conducted by DOE would comply with U.S. Nuclear Regulatory Commission and U.S. Department of Transportation regulations. Associated transatlantic shipment would comply with International Atomic Energy Agency requirements. In Section J.6.2, DOE reviewed the potential maximum impacts from the marine transportation of mixed oxide fuel from Europe to a representative military port, Charleston, South Carolina, and overland transportation to Hanford. Also in that section, a bounding analysis demonstrates that the maximum potential radiological risks to the surrounding public from mixed oxide fuel shipments would be extremely small (e.g., less than 1 chance in a trillion for a latent cancer fatality per shipment from severe accidents at docks and in channels and less than 1 chance in 50 billion for a latent cancer fatality per shipment from overland highway accidents).

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159-15: Through a Memorandum of Understanding with NASA, DOE provides radioisotope power systems, and the plutonium-238 that fuels them, for space missions that require or would be enhanced by their use. In addition, under the National Space Policy issued by the Office of Science and Technology Policy in September 1996, and consistent with DOE's charter under the Atomic Energy Act, DOE is responsible for maintaining the capability to provide the plutonium-238 needed to support these missions. There are approximately 9 kilograms (19.8 pounds) of plutonium-238 in the U.S. inventory available to support future NASA space missions. Based on NASA guidance to DOE on the potential use of radioisotope power systems for upcoming space missions, it is anticipated that the existing plutonium-238 inventory will be exhausted by approximately 2005. Under the No Action Alternative, DOE would continue to purchase plutonium-238 to meet the space mission needs for the 35-year evaluation period considered in the NI PEIS. However, DOE recognizes that any purchase beyond what is currently available to the United States through the existing contract would likely require negotiation of a new contract and may require additional NEPA review.

The May 22, 2000, correspondence from NASA to DOE identifies that NASA no longer has a planned requirement for small radioisotope thermoelectric generator (SRTG) power systems. This does not mean that NASA no longer requires DOE to provide the necessary plutonium-238 to support deep space missions. Rather, the SRTG development efforts were stopped in order to permit reprogramming of funds to support development of a new radioisotope power system based on a Stirling technology generator. This new radioisotope power system, referred to in the subject correspondence, requires one-third less plutonium-238 as its fuel source. However, the Stirling technology is developmental and NASA has requested in a September 22, 2000, letter to DOE that large RTGs be maintained as backup. Section 1.2.2 of Volume 1 was revised to clarify plutonium-238 mission needs. The major mission of FFTF would not be the production of plutonium-238. Rather, all three missions are of equal importance; no one mission is given priority in the NI PEIS.

159-16: DOE provided notice of scheduled public hearings in accordance with the requirements of CEQ and DOE regulations (i.e., 40 CFR Parts 1503.1 and 1506.6 and 10 CFR Part 1021.313, respectively). This included announcement of the hearings in the Federal Register as well as in the

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local media. In addition, copies of the Draft NI PEIS and/or the Summary (including the public hearing schedule) were sent to each individual or group listed to receive it at the address on record. Additional notification to the public concerning meetings on the Draft PEIS were made by the Oregon Office of Energy to members of 20 focus groups in six Oregon communities and other Oregon interest groups.

- 159-17:** The public hearing format was designed to be fair and unbiased. The public hearing format used was based on stakeholder input and was presented in the Notice of Availability (65 FR 46443 et seq.) for the Draft NI PEIS. This format was intended to encourage public participation, regardless of the motivation for attending the hearing. It provided an opportunity for the participants to meet one another, exchange information, and share concerns with DOE personnel available throughout the course of each hearing to answer questions. The meetings were facilitated by an independent moderator to ensure that all persons wishing to speak had an opportunity to do so. Persons wishing to comment were selected at random from the audiences rather than according to the order in which they registered. This was accomplished by a random number drawing. In addition to the comment recorder stationed at the main hearing, a second recorder was available in an adjacent room to receive comments without the need to await selection at the main proceeding. The hearing format used promoted open and equal representation by all individuals and groups.
- 159-18:** The need for medical isotopes and alternate suppliers are discussed in Section 1.2.1 of Volume 1. Safety and health issues are discussed throughout Chapter 4 of Volume 1 with details given in Appendixes H through J of Volume 2. Waste generation and waste management for each of the alternatives are discussed throughout Chapter 4 of Volume 1. As discussed in the response to Comment Number 158-7, the cost report and nonproliferation report were made available to the public on August 24, 2000 and September 8, 2000, respectively.
- 159-19:** DOE does not engage in or condone the actions alleged in the comment. DOE did not and does not label organizations or individuals. Neither does it interfere with workshops held by an organization, nor exert any influence or authority in the matter of fees for security and law enforcement charged by the owners or managers of facilities in which public meetings are held. Such matters are determined by the rules and

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regulations adopted by or applied to these facilities, consistent with local laws and municipal requirements. For the record, DOE did not characterize public hearings participants as “opposition” or “protest” groups, and further, did not attempt to recommend or influence any meeting facility fees or security measures applicable to any group or individual.

- 159-20:** The commentors’ concern for proper notice of the public hearing process is addressed in response to Comment 159-16.
- 159-21:** The commentors’ request to establish procedures for unbiased hearings is addressed in response to Comment 159-17
- 159-22:** The issue of opposition groups is addressed in response to Comment 159-19.
- 159-23:** DOE notes the commentors’ views.

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Commentor No. 160: John Paul Mansfield

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Draft PEIS Comment Form

5 MINUTES

I JOHN PAUL MANSFIELD TOOK PART IN A CLINICAL STUDY OF COMPARISONS BETWEEN ANGLICAN-JAPANESE NON-PREGNANT WOMEN - WE STUDIED AT THE IMPERIAL CANCER RESEARCH FUND LABORATORIES IN LINCOLN'S INN FIELDS, LONDON IN 1973. THE STUDY WAS FOCUSED ON THE ANDROGENS AND OESTROGENS UNDER DR. BULLBROOK. THE QUEEN IS THE PATRON OF THIS FUND WHICH WAS ENTIRELY SUPPORTED BY CHARITY - WE HAD \$20+ MILLION BOUNDS AND DIDN'T FIND A CURE. THERE WAS NO CORRELATION BETWEEN RESULTS - WHY - ? DO YOU SUPPOSE IT HAD NOTHING TO DO WITH DIET - BUT AS A RESULT OF THE BOMBS OF HIROSHIMA + NAGASAKI ?

AS A PARAMEDIC IN SAN DIEGO COUNTY UCSD-SAN DIEGO (GRADUATED IN 1979). IN LA JOLLA COLLEGE PINES RAD. SITES. AS A PARAMEDIC ON UNIT NUMBER 9 OUT OF FIRE STATION I CONDUCTED A RADIOACTIVE SPILL DRILL WITH VERY LITTLE NOTICE AND RECEIVED A COMMENDATION FOR OUR RESPONSE FROM THAT FACILITY. LET ME SAY IT WAS ONLY A DRILL. - LIVERPOOL 95-BK

There are several ways to provide comments on the Nuclear Infrastructure PEIS. These include:

- attending public meetings and giving your comments directly to DOE officials
- returning this comment form to the registration desk at the meeting or to the address below
- calling toll-free and leaving your comments: 1-877-562-4593
- faxing your comments toll-free to: 1-877-562-4592
- commenting via e-mail: NuclearInfrastructure-PEIS@hq.doe.gov

Name (optional):

JOHN PAUL MANSFIELD

Organization:

ESPERANTO.COM @ MSN

(Home) Organization Address (circle one):

4800 NW HARNEY

VANCOUVER WA 98663-1374

City:

State:

Zip Code:

Telephone (optional):

503-740-1524 cell #

E-mail (optional):

SAA

COMMENTS MUST BE POSTMARKED BY September 18, 2000

For more information contact: Collette E. Brown, NE-SO
U.S. Department of Energy • 19901 Germantown Road • Germantown, MD 20874
Toll-free telephone: 1-877-562-4593 • Toll-free fax: 1-877-562-4592
E-mail: NuclearInfrastructure-PEIS@hq.doe.gov



160-1

160-1: Comment noted.

NUCLEAR INFRASTRUCTURE PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT